

Local

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Larry Greene
AIR POLLUTION CONTROL OFFICER

L1

July 10, 2013

SENT VIA E-MAIL ONLY

Mr. Bob Sleppy
California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

**Draft Environmental Impact Report for the Proposed Level II Infill Correctional Facilities Project
(SCH# 2012122038, SAQMD# SAC201301458)**

Dear Mr. Sleppy:

Thank you for providing the Draft Environmental Impact Report (EIR) for the Proposed Level II Infill Correctional Facilities Project to the Sacramento Metropolitan Air Quality Management District (SMAQMD) for review. SMAQMD has jurisdiction over the air quality resources in Sacramento County. One of the potential alternate sites for the project includes the Folsom State Prison/California State Prison Sacramento facility (FSP/CSPS). Staff comments on the portions of the EIR pertaining to the FSP/CSPS site follow.

1. Clarification is needed in the last paragraph on page 3.1-20 (Volume 4) regarding emissions exceeding SMAQMD operational significance thresholds. The analysis indicates emissions do not exceed the thresholds, which is not reflected in this paragraph.
2. Naturally occurring asbestos (NOA) is described as being absent from the soil at the FSP/CSPS site on page 3.5-5 (Volume 4) in the Geological Resources section, therefore there is no discussion about handling NOA in the Air Quality section. SMAQMD disagrees with the omission and encourages CDCR to review SMAQMD's published resources regarding the likelihood of NOA being present in Eastern Sacramento County in Special Report 192 and SMAQMD's letter to jurisdictions in 2006 and include the necessary requirements to comply with the NOA air toxic control measure for construction at FSP/CSPS. The following are links to SMAQMD's resources:
<http://www.airquality.org/compliance/NOA/NOAJurisdictionLtr2006July10.PDF>
http://www.airquality.org/compliance/NOA/East_Sac_County_SR192Report.pdf
3. All projects are subject to SMAQMD rules in effect at the time of construction. Attached is a list of rules that commonly apply during construction. A complete listing of current rules is available at www.airquality.org or by calling 916-874-4800.

Please contact me at 916-874-4881 or khuss@airquality.org if you have any questions regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Karen Huss".

Karen Huss
Associate Air Quality Planner/Analyst
Land Use and Mobile Sources Division

Attachment

Cc: Larry Robinson, SMAQMD

777 12th Street, 3rd Floor ■ Sacramento, CA 95814-1908
916/874-4800 ■ 916/874-4899 fax
www.airquality.org

L1-1

L1-2

L1-3

L1-4

SMAQMD Rules & Regulations Statement (revised 3/12)

The following statement is recommended as standard condition of approval or construction document language for all development projects within the Sacramento Metropolitan Air Quality Management District (SMAQMD):

All projects are subject to SMAQMD rules in effect at the time of construction. A complete listing of current rules is available at www.airquality.org or by calling 916.874.4800. Specific rules that may relate to construction activities or building design may include, but are not limited to:

Rule 201: General Permit Requirements. Any project that includes the use of equipment capable of releasing emissions to the atmosphere may require permit(s) from SMAQMD prior to equipment operation. The applicant, developer, or operator of a project that includes an emergency generator, boiler, or heater should contact the SMAQMD early to determine if a permit is required, and to begin the permit application process. Portable construction equipment (e.g. generators, compressors, pile drivers, lighting equipment, etc.) with an internal combustion engine over 50 horsepower are required to have a SMAQMD permit or a California Air Resources Board portable equipment registration. Other general types of uses that require a permit include, but are not limited to dry cleaners, gasoline stations, spray booths, and operations that generate airborne particulate emissions.

Rule 403: Fugitive Dust. The developer or contractor is required to control dust emissions from earth moving activities, storage or any other construction activity to prevent airborne dust from leaving the project site.

Rule 414: Water Heaters, Boilers and Process Heaters Rated Less Than 1,000,000 BTU PER Hour. The developer or contractor is required to install water heaters (including residence water heaters), boilers or process heaters that comply with the emission limits specified in the rule.

Rule 417: Wood Burning Appliances. This rule prohibits the installation of any new, permanently installed, indoor or outdoor, uncontrolled fireplaces in new or existing developments.

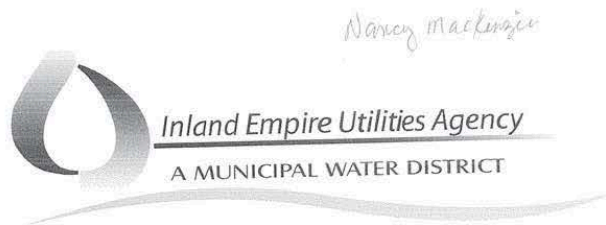
Rule 442: Architectural Coatings. The developer or contractor is required to use coatings that comply with the volatile organic compound content limits specified in the rule.

Rule 460: Adhesives and Sealants. The developer or contractor is required to use adhesives and sealants that comply with the volatile organic compound content limits specified in the rule.

Rule 902: Asbestos. The developer or contractor is required to notify SMAQMD of any regulated renovation or demolition activity. Rule 902 contains specific requirements for surveying, notification, removal, and disposal of asbestos containing material.

Naturally Occurring Asbestos: The developer or contractor is required to notify SMAQMD of earth moving projects, greater than 1 acre in size in areas "Moderately Likely to Asbestos" within eastern Sacramento County. Asbestos Airborne Toxic Control Measures, Section 93105 & 93106 contain specific requirements for surveying, notification, and handling soil that contains naturally occurring asbestos.

| Letter L1 Response | Karen Huss, Sacramento Air Quality Management District July 10, 2013 |
|--------------------------|--|
| L1-1 | Introductory remarks pertaining to the comment letter are noted. No specific comments addressing the environmental analysis were raised; therefore, no further response can be provided. |
| L1-2 | <p>In response to the comments provided, the text in the last paragraph on page 3.1-20 in Volume 4 of the DEIR has been modified, as follows.</p> <p><i>Operation of the level II infill correctional facility at the FSP/SAC Infill Site would <u>not</u> result in area- and mobile –source emissions that would exceed the SMAQMD’s applicable operational significance thresholds. Although development-generated stationary-source emissions would be additive, such emissions would be controlled and limited through SMAQMD’s permit process. Thus, operation-related regional emissions of criteria air pollutants and precursors would not violate a standard or contribute substantially to an existing or projected air quality violation, and/or expose sensitive receptors to substantial pollutant concentrations. As a result, this impact would be less than significant.</i></p> |
| L1-3 | <p>CDCR has reviewed the discussion of the presence of naturally occurring asbestos (NOA) within the FSP/SAC Infill Site. The second paragraph under subheading, “Naturally Occurring Hazards,” on page 3.6-2 of Volume 4 of the DEIR provides the following information related to naturally occurring asbestos</p> <p>Although serpentine rocks are known to occur in Sacramento County, the infill site is underlain with primarily granodiorite (a coarser-grained, plutonic rock, similar to granite in composition but with more plagioclase feldspar). The California Department of Conservation, Division of Mines and Geology, maps indicate that the nearest ultramafic rock unit is located north of Folsom Lake (CDC 2000). The infill site is located in an area with the least likelihood to contain naturally occurring asbestos. The area south of the infill site where the existing FSP and SAC facilities are located is mapped as moderately likely to contain natural occurring asbestos.</p> <p>This comment references Special Report 192 from the Department of Conservation: <i>Relative Likelihood for the Presence of Naturally Occurring Asbestos in Eastern Sacramento County, California</i> (Higgins and Clinkenbeard 2006). The last page of this report contains a map entitled, Relative Likelihood for the Presence of Naturally Occurring Asbestos in Eastern Sacramento County, California. In this map, roadways associated with the existing FSP/SAC facility are shown at the edge of an area delineated as “Areas Moderately Likely to Contain NOA.” The SAC/FSP Infill Site is located to the north of that area, within an area considered least likely to contain NOA. Based on this discussion, CDCR believes the EIR properly addresses the potential presence of NOA.</p> |
| L1-4 | CDCR agrees with the comment that the project would be subject to the SMAQMD rules in effect at the time of construction. |



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 www.ieua.org

L2

July 10, 2013

California Department of Corrections and Rehabilitation
 Office of Facility Planning, Construction and Management
 9838 Old Placerville Road, Suite B
 Sacramento, CA 95827

Subject: Release of Draft EIR for the Level II Infill Correctional Facilities Project

Dear Sir or Madam,

Inland Empire Utilities Agency (IEUA) is a municipal water district which manages a regional wastewater system and also supplies imported water and recycled water to a 242-square mile area in western San Bernardino County. One of our member agencies is the city of Chino, where the California Institute for Men is located. As a result, IEUA is very interested in the Draft Environmental Impact Report for the Level II Infill Correctional Facilities Project.

The IEUA Planning Department has reviewed the above referenced subject and has the following comments/recommendations:

- The proposed project involves the construction and operation of up to 2,376 low-security inmate beds as infill within existing California correctional facilities. The California Institute for Men in the City of Chino is one of five alternative sites considered in the Draft EIR. The CIM was not evaluated at a level equal to the other four sites. It was stated that additional study would be needed to address the adequacy of infrastructure capacity at the site.
- Although CIM is not under active consideration, if at any time in the future there were to be additional studies of possible expansion of the CIM, IEUA would like to be notified. We are currently updating our wastewater facilities master plan and we need to be aware of any expected new connections. Most of the sewage from the CIM is treated in an on-site system belonging to the prison, but a portion is discharged to the City of Chino sewers and then conveyed to our Regional Sewerage System and treated at IEUA's Regional Plant No. 5 (RP-5). RP-5 is expected to reach the limit of its capacity within five to ten years. IEUA's new

L2-1

L2-2

L2-3

Water Smart – Thinking in Terms of Tomorrow

Terry Catlin
President

Michael E. Camacho
Vice President

Steven J. Elie
Secretary/Treasurer

Gene Koopman
Director

Angel Santiago
Director

California Department of Corrections and Rehabilitation
July 10, 2013
Page 2

facilities master plan will examine the impacts of increased wastewater flows on RP-5.

L2-3 cont'd

If you have any questions, please feel free to contact me at (909) 993-1634 or by email at ehurst@ieua.org.

Regards,



Elizabeth Hurst
Inland Empire Utilities Agency

| Letter L2 Response | Elizabeth Hurst, Inland Empire Utilities Agency (IEUA) July 10, 2013 |
|-----------------------------------|--|
| L2-1 | Comments related to IEUA interest in the DEIR are noted. Responses to specific comments pertaining to the analysis are provided below. |
| L2-2 | The commenter is correct that the CIM was not evaluated at a level equal to the other four sites due to issues related to infrastructure capacity. Additional analysis of potential impacts pursuant to CEQA would be required if CDCR were to select CIM. |
| L2-3 | IEUA's request for notification related to possible future expansion of CIM is noted. No specific comments addressing the environmental analysis were raised; therefore, no further response need be provided. |

Municipal Services
Robert B. Leonard
Chief Deputy County Executive

Department of Transportation
Michael J. Penrose, Director



County of Sacramento

County Executive
Bradley J. Hudson

L3

July 18, 2013

California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

SUBJECT: Comments on the Notice of Availability of a Draft Environmental Impact Report for the Proposed Level II Infill Correctional Facilities Project, SCH # 2012122038.

The Department of Transportation has reviewed the Notice of Availability of a Draft Environmental Impact Report for the Proposed Level II Infill Correctional Facilities Project. We have no comments on this document at this time.

L3-1

Should you have any questions, please contact me at (916) 875-2844.

Sincerely,

A handwritten signature in black ink, appearing to read "K. Atwal".

Kamal Atwal, P.E.
Associate Transportation Engineer
Department of Transportation

KA/mp

Cc: Dean Blank, DOT
Matt Darrow, DOT
Kate Rose, Community Planning and Development Department



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www.sacdot.com

**Letter
L3
Response****Kamal Atwal, County of Sacramento**
July 18, 2013

L3-1 The commenter states they have no comments on the DEIR. This comment is noted.

**Community Development Agency**

810 Court Street, Jackson CA 95642 Phone 209-223-6429 Fax: 209-223-6395

L4

July 19, 2013

Mr. Robert Sleppy
California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, Ca 95827

**RE: LEVEL II INFILL CORRECTIONAL FACILITIES PROJECT MULE CREEK
STATE PRISON SITE**

Dear Mr. Sleppy,

The Amador County Community Development Agency thanks you for the opportunity to review the draft environmental impact report for the Level II Infill Correctional Facilities Project at Mule Creek State Prison. Included with this letter are letters of comment from the Environmental Health Department and the Department of Transportation and Public Works.

L4-1

Please contact Mr. Israel, Director of the Environmental Health Department or myself with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Aaron Brusatori".

Aaron Brusatori, PE
Community Development Director

~~Co- Building Department~~
~~Supervisor Oneto~~
~~CAO~~

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**ENVIRONMENTAL HEALTH**
AMADOR COUNTY LAND USE AGENCY

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County Administration Center • 810 Court Street • Jackson, CA 95642-2132

July 12, 2013

Mr. Robert Sleppy
California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

Re: Level II Infill Correctional Facilities Project
Mule Creek State Prison Site

Dear Mr. Sleppy:

Thank you for the opportunity to comment on the draft environmental impact report for this project.

At the July 9, 2013 presentation to the Amador County Board of Supervisors, I understood that the project would eliminate the use of on-site spray fields and send all treated wastewater to the City of Ione tertiary WWTF. My read of the DEIR is that some on-site application will continue but that additional flows will be sent to Ione. Please provide clarification whether the project will transfer all reclaimed water to Ione and whether there will be tertiary treatment of all Mule Creek wastewater or only as needed by the City of Ione based on demand.

L4-2

Regardless whether some or all project effluent is diverted to the City of Ione, it appears that the project depends on the City to complete a separate project. What are the potential impacts and mitigation if that separate project is not completed in time?

L4-3

Based on the history of upset conditions at local wastewater treatment facilities, including that serving MCSP, I question the finding that potential impact of long-term water quality degradation from the use of spray fields is less than significant. I suggest further analysis of the potential for future upset conditions and discussion of any appropriate mitigation measures to reduce potential impacts to less than significant levels.

L4-4

The document cites Castle Oaks groundwater monitoring data in table 3.7-3. Would not the groundwater data collected specific to the MCSP WWTF be more germane to groundwater conditions at the project site?

L4-5

Mr. Robert Sleppy
 California Department of Corrections and Rehabilitation
 Page 2
 July 12, 2013

Page 3.7-8 states, "VOCs will readily volatilize post-treatment in the storage basins, or when applied in the irrigation water." Please cite the authority for this statement and qualify, as necessary. Low levels of VOCs were detected in groundwater wells in close proximity to MCSP in 2006.

L4-6

Please provide additional information to clarify and support the historic nitrogen loading rates discussed on page 3.7-8. Are treatment plant improvements planned or under way that will further eliminate nitrogen and/or phosphorus compounds, TDS, or other constituents? Please provide information to support the land application area needed by the project based on expected effluent characteristics and agronomic rates.

L4-7

L4-8

The project would nearly double the bed space at Mule Creek and remove a significant portion of the existing spray field. Though AB 109 has downsized populations, trends could change again in the future. Populations at MCSP have routinely been well above design capacity, sometimes exceeding 200%, and it is not unforeseeable that this could happen again. It has been reported that during periods of high population peak flows at MCSP's WWTP severely impacted the capability to properly treat wastewater, a factor in issuance of the CDO.

L4-9

I suggest the DEIR discuss the possibility of higher populations, such as 200% of bed space, and how this may impact the on-site WWTP and on- or off-site spray fields. Mitigation measures could then be discussed which would reduce potential impacts linked to high population events to a less than significant level. The higher population scenario would likely also impact other areas such as solid waste generation, traffic, etc.

L4-10

Table 3.12-4 indicates that 2006 average flows were 190 gpid. This was prior to closure of the Preston Youth Correctional Facility and emplacement of water conserving devices and practices within MCSP. Flows in 2012 averaged 153 gpid. The DEIR assumes 140 gpid for the project and assumes one inmate per bed. The document should clarify and justify the difference between an average of 153 gallons per inmate in the existing facility, populated at >1 inmate per bed, and a planned 140 gallons per bed in the proposed project is justified.

L4-11

I question the statement on page 3.12-8, "CDCR contracts with Amador County for solid waste disposal services. Amador County contracts the collection, transport, and disposal of solid waste to ACES Waste Services, Inc., a private solid waste disposal company located in Pine Grove." I do not believe that CDCR contracts with the County for service. I believe the current business address for ACES is 6500 Buena Vista Road, Ione.

L4-12

Mr. Robert Sleppy
California Department of Corrections and Rehabilitation
Page 3
July 12, 2013

Is there currently no recycling or waste diversion program within MCSP? What would the creation of a recycling program mean in terms of waste diversion? Can an estimate be provided of the volume of the diverted waste stream?

L4-13

Sincerely,



Michael W. Israel, REHS
Environmental Health Director

MWI:ew

cc: Amador County Board of Supervisors
Chuck Iley, Amador County CAO
Edwin Pattison, Ione City Manager

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TRANSPORTATION AND PUBLIC WORKS

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July 25, 2013

CDCR
Office of Facility Planning
Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

RE: Draft Environmental Impact Report Level II Infill Correctional Facilities Project

Dear :

First, we would like to thank the CDCR, ASCENT Environmental, and Fehr & Peers for the Traffic Impact Study Scope of Work and Mitigation review meetings. We have reviewed the Draft Environmental Impact Report (DEIR) for The CDCR Level II Infill Correctional Facilities Project for Mule Creek State Prison located in the City of Ione dated June 2013 by ASCENT ENVIRONMENTAL. We have compiled the following comments for your consideration in the preparation of the Final Environmental Impact Report (FEIR).

- Is there a page missing between page 3.11-34 and 3.11-37, or is there a page numbering error?
- Shouldn't Table 3.11-13 and Table 4-1 contain the same projects, and shouldn't the Buena Vista Casino be included in both Tables?
- Impact 3.11-1a, Impacts on Intersection Operations (Complex), Mitigation Measure 3.11-1 reads "CDCR will pay the County's regional transportation fee, which would include CDCR's fair share contribution towards the installation of a traffic signal at the intersection of SR 104, SR 88, and Jackson Valley road." As the reports points out, there is no planned project at this intersection location. The Amador County Circulation Element / Regional Transportation Plan Policy 1B(19) states "If a new development project would contribute to the need for improvements that are not included in either the Tier 1 or Tier 2 funding plans of the RTP/Circulation Element Update, their impacts shall be mitigated through a fair-share contribution toward those new improvements needed to achieve the level of service objectives set forth in Goal 1(A)2. Since there is no project planned at this location, the proper mitigation measure is for the project to pay its fair-share contribution. This would be in addition to payment of the Traffic Mitigation Fees.
- Impact 3.11-6a, Existing Plus Approved Projects Impacts on Roadway Segment Operations (Complex), Mitigation Measure 3.11-6a reads "Development of a level II infill correctional facility complex at the MCSP Infill Site would add traffic to SR 88 east of its intersection with SR 104, which would operate at unacceptable LOS D under E+AP conditions. The impact could be mitigated by widening SR 88 to four lanes; however, SR 88 is under Caltrans jurisdiction, and Caltrans currently has no plans to widen the roadway. As a result, the cost of such an improvement would not be accommodated as part of a capital improvement program, and the cost for such an improvement would likely be the responsibility of the mitigating party. Due to the potential costs (greater than 5 million dollars) associated with this improvement, considering that a level II infill correctional facility complex would represent 0.8% of the daily traffic along this segment under E+AP conditions, widening of this segment

L4-14

L4-15

L4-16

L4-17

L4-18

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as mitigation is considered infeasible because the cost would not be proportional to the level of impact generated by the proposed project and there would be no mechanism for reimbursement of costs that are not the responsibility of CDCR. There is no other feasible mitigation measure that could improve traffic conditions along this roadway segment.” Policy 1B(19) of the Amador County Circulation Element / Regional Transportation Plan states “If a new development project would contribute to the need for improvements that are not included in either the Tier 1 or Tier 2 funding plans of the RTP/Circulation Element Update, their impacts shall be mitigated through a fair-share contribution toward those new improvements needed to achieve the level of service objectives set forth in Goal 1(A)2. Since there is no project planned at this location, the proper mitigation measure is for the project to pay its fair-share contribution. This would be in addition to payment of the Traffic Mitigation Fees.

- While the Transportation Section is included in the DEIR and the Traffic Modeling Results are included in Appendix 3d, there is no separate Traffic Impact Study included in the Appendix. Was a stand-alone TIS prepared, or were the Traffic Modeling Results incorporated directly into the DEIR?

L4-18 cont'd

L4-19

We would be happy to meet with you and/or your consultant if that would be of assistance. If you have any questions, please contact Roger Stuart.

L4-20

For Public Works,


Roger A. Stuart, Senior Project Engineer

cc: Christopher Jordan, AICP, City of Ione
Charles Field, ACTC
John Gedney, CalTrans

FC: CDCR Mule Creek State Prison

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R42

California Department of Corrections and Rehabilitation Mule Creek State Prison Level II Infill Program

Draft Environmental Impact Report review notes – DOT&PW

July 2, 2013

Section 2.3.2 Parking And Service Roads – Approximately 15% of inmates receive visitors on a given weekend/holiday visitation day. Requires 207 parking spaces needed for Single Facility or 417 parking spaces needed for Double Facility

2.3.4 Staffing – Single Facility 193 new staff; Double Facility 377 new staff

2.4 Construction – To begin Spring 2014, Estimated completion date Spring 2016. 6:00am – 4:00pm Monday-Friday. Noise generating construction 7:00am – 7:00pm M-F.

The temporary construction access road shall connect to SR 104 at Castle Oaks Drive – Temporary restriping of Intersection. Waterman Drive may be used, but restricted to light-duty autos and trucks associated with construction workers commute.

3.11 Transportation

3.11.1 Environmental Setting

Employee Traffic: First Watch 10:00pm-6:00am, Second Watch 6:00am-2:00pm, Third Watch 2:00pm – 10:00pm, Support Staff 8:00am-5:00pm, Visiting hours limited to weekends and holidays

Double Facility: 377 additional weekday staff

Single Facility 193 additional weekday staff

Study locations: SR104/Ione Michigan Bar Road, SR104/Irish Hill Road, SR104/SR88/Jackson Valley Road, Michigan Bar Road north of SR 104

Weekday AM Peak Hour 5:00am-9:00am

Weekday Midday Peak Hour 1:00pm-4:00pm

Weekday PM Peak Hour 4:00pm-6:00pm

Table 3.11-3 Intersection LOS Results – Existing Conditions: #13 SR104/SR88/Jackson Valley Road Side Street Stop Control – Jackson Valley Road leg PMPH LOS F(86.6 second delay)(An increase of 69.5 seconds over average intersection delay)

Potential relinquishment of SR16 by Caltrans: Development of Infill Project is not located along SR16 and would not result in an unacceptable LOS at any location along SR16. No impacts with respect to the potential relinquishment of SR16 by Caltrans would result from development of the infill site.

Weekday Project Trip Generation:

Single Facility: 396 daily trips, 84 AMPH trips, 84 PMPH trips, 94 Midday PH trips (1:30pm-2:30pm)
Project facility generates the most trips), 129 additional weekend staff

Double Facility Project: 764 daily trips, 152 AMPH trips, 152 PMPH trips, 193 Midday PH trips, 244 additional weekend staff

Trip Distribution: Single Facility – No project traffic on Irish Hill Road. Traffic on Michigan Bar Road at SR104: 20 AMPH, 22 Midday PH, 20 PMPH. Traffic on Jackson Valley Road at SR88: 2 AMPH, 2 Midday PH, 2 PMPH

Double Facility Trip Distribution – No project traffic on Irish Hill Road. Traffic on Michigan Bar Road at SR104: 36 AMPH, 44 Midday PH, 36 PMPH. Traffic on Jackson Valley Road at SR 88: 3 AMPH, 5 Midday PH, 3 PMPH.

Trip Distribution: 23% travels to/from north on Ione-Michigan Bar Road, 2% travels to/from south on Jackson valley Road

Michigan Bar Road: 23%; Single Facility 91 trips, Double facility 176 trips

Jackson Valley Road: 2%; Single Facility 8 trips, Double facility 15 trips

Existing Plus Level II Infill Project

MM 3.11-1 Pay County's RTMF which includes Projects fair share (2%) contribution towards installation of a traffic signal at intersection of SR104/SR88/Jackson Valley Road. To be consistent with Amador County Circulation Element/RTP Policy 1B(19). This is not an RTP project, therefore, the fair share contribution is required in addition to payment of the RTMF per RTP Policy 1B(19). Caltrans and Amador County have indicated that there are no proposed or planned improvements at this intersection and thus, payment of regional transportation fees would not be expected to result in direct improvement of this intersection.

Impact 3.11-2a Impacts on Roadway Segment Operations (Complex). No mitigation measures are required.

Impact 3.11-3a Impacts on Parking (Complex) – No Mitigation Measures are required.

Impact 3.114a Construction-Related Traffic Impacts (Complex). Construction-traffic trip generation was estimated based on the following assumption: -The number of daily employees during each phase was calculated based on data provided by CDCR regarding construction activities at the California Health Care facility site in Stockton, CA, which is currently under construction. Construction traffic was scaled based on the relative size of projects. -The number of truck trips during demolition/site preparation and grading were calculated based on the cubic yards of material to be moved to/from the site. -The number of truck trips during utilities and building construction were assumed to be 20 one-way trips per

day. Construction activities are expected to generate between 116 and 1,624 daily trips depending on phasing.

Is there a page missing between 3.11-34 and 3.11-37 or a page numbering error?

Mitigation Measure 3.11-4 CDCR will prepare a construction traffic management plan (TMP) in consultation with the applicable transportation entities including Caltrans and the City of Lone. The TMP will evaluate pavement conditions along the haul routes designated and if necessary, specify mitigations to: -Avoid or minimize the use of haul routes where the pavement condition is physically deficient, according to each jurisdiction's standards, or -enter into mitigation agreements to improve the physical condition of haul routes that are in a physically deficient condition. The construction contractor shall limit construction-related vehicles to use of SR88, SR104, and SR124 for the transportation of materials to and from the infill site. The construction contractor will not use the Lone-Michigan Bar Road, Tonzi Road, or Sutter Lone Road.

Existing Plus Approved Projects Conditions

Shouldn't Table 3.11-13 and Table 4-1 contain the same projects?

Table 3.11-13 – Include the Buena Vista Casino as an approved project

Existing Plus Approved Projects Plus Level II Infill Facility Complex Traffic Operations Impacts

Impact 3.11-5a Existing Plus Approved Impacts on Intersection Operations(Complex)

Implement Mitigation Measure 3.11-1

Impact 3.11-6a Existing plus approved Projects Impacts on Roadway Segment Operations (Complex): SR88 East of SR104 would operate at unacceptable LOS D. "No feasible mitigation is available." Impact could be mitigated by widening SR88 to four lanes. Caltrans has no plans to widen. Cost of such a project would not be accommodated as part of a capital improvement program and the cost would be the responsibility of CDCR (mitigating party). Potential costs >\$5,000,000. CDCR Infill Facility (Complex) would represent 0.8% of the daily traffic under E+AP conditions. Mitigation is considered infeasible because cost would not be proportional to level of impact generated by the proposed project and there will be no mechanism for reimbursement of costs that are not the responsibility of CDCR.

Cumulative (2035) Conditions

Impact 3.11-7a Cumulative Impacts on Intersection Operations (Complex). SR104/SR88/Jackson valley Road Intersection would operate at an unacceptable LOS – side street movement delay would increase by more than 5 seconds. Implement MM 3.11-1.

Impact 3.11-8a Cumulative Impacts on Roadway Segment Operations(Complex). SR88 East of SR104 intersection will operate at an unacceptable LOS under Cumulative Conditions. No feasible mitigation is available – See Impact 3.11-6a discussion. Proportionate share 0.6%.

Alternative Single Level II Infill Correctional Facility

Impact 3.11-1b Impacts on Intersection Operations(Single Facility) – See discussion Impact 3.11-1a

Impact 3.11-2b Impacts on Roadway Segment Operations(Single facility) – No roadway segments would operate at unacceptable levels – No mitigation required.

Impact 3.11-4b Construction-Related Traffic Impacts (Single Facility) – Refer to Impact 3.11-4a. Implement Mitigation Measure 3.11-4.

Impact 3.11-5b Existing Plus Approved Projects Impacts on Intersection Operations (Single facility). See Impact 3.11-1. Implement Mitigation measure 3.11-1.

Impact 3.11-6b Existing Plus Approved Projects Impacts on Roadway segment Operations(Single Facility) – See Impact 3.11-6a. No feasible Mitigation.

Impact 3.11-7b – Cumulative Impacts on Intersection Operations(Single facility) – Implement Mitigation measure 3.11-1.

Impact 3.11-8b Cumulative Impacts on Roadway Segments Operations(Single Facility) – No feasible Mitigation available.

4.2 Related Projects Table 4-1 List of Projects in the Vicinity of the MCSP Infill Site – Left out the Buena Vista Casino Project and the Buena Vista Biomass Project

5.1.2 Significant Unavoidable Impacts of the Project

Proposed Level II Infill Correctional Facility Complex Transportation

Impact 3.11-4a Construction-Related Traffic Impacts – Traffic Management Plan will be required

Impact 3.11-6a Existing plus Approved Projects Impacts on Roadway segment Operations – SR 88 would operate at unacceptable LOS D under Existing Plus Approved Projects (E+AP) conditions. Mitigate by widening SR 88 to four lanes

Impact 3.11-8a Cumulative Impacts on Roadway Segment Operations - SR 88 would operate at unacceptable LOS D under Existing Plus Approved Projects (E+AP) conditions. Mitigate by widening SR 88 to four lanes

Alternative Single Level II Infill Correctional Facility

Impact 3.11-4b Construction-Related Traffic Impacts – Traffic Management Plan will be required

Impact 3.11-6b Existing plus Approved Projects Impacts on Roadway segment Operations – SR 88 would operate at unacceptable LOS D under Existing Plus Approved Projects (E+AP) conditions. Mitigate by widening SR 88 to four lanes

Impact 3.11-8b Cumulative Impacts on Roadway Segment Operations - SR 88 would operate at unacceptable LOS D under Existing Plus Approved Projects (E+AP) conditions. Mitigate by widening SR 88 to four lanes

Caltrans February 4, 2013 NOP Comment Letter – There will be an increase in impervious areas due to Project construction which would increase stormwater runoff and impact the SR 104 Mule Creek Bridge. Project design needs to attenuate the post-construction peak flows for significant storm recurrence intervals (2,10,25,50 and 100 year storms) to pre-construction peak flows. Check bridges on County roads

While the Transportation Section is included in the DEIR and the Traffic Modeling results are included in Appendix 3D, there is no separate Traffic Impact Study included in the Appendix. Was a stand-alone TIS prepared, or were the Traffic Modeling Results incorporated directly into the DEIR?

**Letter
L4
Response****Aaron Brusatori, PE, Amador County**
July 19, 2013

- L4-1 Introductory remarks to the comment letter are noted. Specific comments on the DEIR and the related responses are provided below.
- L4-2 Implementation of the Level II Infill Correctional Facilities Project would not completely eliminate the use of onsite spray fields at MCSP. Rather, as proposed, implementation of the project at this site would result in a reduction of up to 103 acres from the existing 296 net acres of spray fields. Wastewater effluent that would have otherwise been distributed onto these fields would be directed to a new effluent spray field located on existing agricultural land west of the City of Lone's WWTP on private property known as Greenrock Ranch. It is anticipated the effluent would be used to cultivate alfalfa and similar fodder crops (refer to the last paragraph on page 2-11 and Exhibit 2-5 of Volume 3 of the DEIR). In the future, and not as part of this project, CDCR could consider securing more fields from Greenrock Ranch for the balance of effluent generated by the MCSP WWTP, and CDCR would no longer use the other spray fields (not affected by the project) at MCSP.

With regards to the potential for the City to operate one or more new effluent spray fields as described in the last paragraph on page 3.7-16 of Volume 3 of the DEIR:

Ultimately, CDCR may opt to send part or all of its treated secondary effluent to the City of Lone WWTP, however ... [i]f the remaining MCSP spray fields discontinue operation (not currently planned), additional environmental analysis and CEQA compliance may be required to address the need for additional irrigable land requirement.

- L4-3 Based on initial effluent treatment and disposal evaluations conducted by CDCR and GHD, CDCR, pending an agreement with the City of Lone, would direct flows from MCSP through the existing pipe to the City of Lone where they would be directed to the new spray fields. No additional wastewater treatment of the effluent from MCSP by the City of Lone WWTP would be needed because the prison's plant provides adequate treatment and disinfection in accordance with its waste-discharge permit. CDCR has determined that the existing storage capacity of the MCSP and Preston Reservoirs is sufficient to store effluent for the new spray field (Lindow 2013). However, CDCR is planning to contract with the City of Lone to develop additional infrastructure (irrigation pipe, sprinklers, etc.) for new spray fields. The contract would cover the additional cost burden associated with CDCR's infrastructure needs and operation of the new spray fields.

Pursuant to SB 1022, CDCR is planning to activate the proposed infill facilities by the end of 2016. Based on CDCR's evaluation of the current and projected waste water treatment and effluent disposal needs the proposed additional spray fields would not be needed until approximately the end of the first quarter of 2017 because treated effluent is typically stored in the winter months. This means that CDCR has several months within which to secure and develop new effluent spray fields through a contract with the City. This is considered to be a reasonable schedule within which the City can complete its initial construction of additional spray fields. The "construction" would involve relatively modest equipment including installation of new pipelines to transport effluent, new irrigation pipes/equipment, run-off return systems, potentially a small on-line storage reservoir, and groundwater/surface water run-off monitoring systems.

While not its preferred option if the City will not be able to complete the proposed spray field project by early 2016 CDCR will evaluate other options, including reaching a direct agreement with the Greenrock Ranch or another landowner. The proposed infill complex would not be made operational until such time as adequate effluent disposal capacity is available, whether through the City, additional CDCR property, or a third-party landowner. Should such a change to the project occur, CDCR would evaluate the need for supplemental analysis pursuant to CEQA at that time. However, as of October 1, 2013, CDCR has reached a preliminary agreement with the City to 1) contract with the City for the design and construction of the necessary infrastructure to transfer additional effluent from MCSP to the proposed spray fields; 2) secure a long term land lease for the spray fields; 3) secure a new or amended waste discharge permit for the operation of the spray fields; and, 4) install groundwater wells and monitor groundwater quality. As noted on page 3.7-16 of Volume 3 of the DEIR, CDCR is also evaluating, in cooperation with the City, potential opportunities for additional effluent reuse that could remove the need for disposal of effluent on CDCR property at MCSP.

- L4-4 CDCR appreciates the concerns raised by the commenter with respect to the potential for future upset conditions. CDCR has been diligent in its efforts to remove the Cease and Desist Order imposed on it by the RWQCB, which was accomplished in July of this year, and, even with removal of the order, is planning an upgrade to the plant. The upgrade of the plant and use of the new disposal fields will be subject to RWQCB permitting and approval, and will serve to increase the effectiveness and reliability of the plant. Therefore, additional future upset conditions are not foreseeable. CDCR intends to operate the upgraded plant to avoid the upset conditions that occurred several years ago. Significant water quality impacts are, therefore, not expected.
- L4-5 The commenter is correct that there is wastewater quality data gathered by CDCR that documents groundwater quality conditions on CDCR property. This information was provided as part of the DEIR in summary form on page 3.7-8 of Volume 3. Due to the proximity of the Castle Oaks wells to the infill site and MCSP spray fields, the DEIR included water quality data from the Castle Oaks wells in addition to the CDCR well data. Both sets of data are considered to be appropriate for the purposes of assessing impacts associated with the proposed project.
- L4-6 When VOCs (including THMs) come into contact with oxygen, they react with it and volatilize into the air. Reaction with oxygen can occur in aerobic storage basins near the surface, and through sprinkler irrigation of treated effluent. VOC volatilization is correlated with length of irrigation spray from emitter. The citation requested by this comment is a 2006 report by Kenneth Pohlig titled *Investigation of Trihalomethane Generation and Fate at 25 Municipal Wastewater Treatment Plants in North Carolina*. This report is available at the following web address: http://www.ncsafewater.org/Pics/Training/AnnualConference/AC08TechnicalPapers/Wastewater/AC08WWTues0245_Pohlig.pdf. The commenter does not provide any evidence or citation related to the assertion that low levels of VOC have been detected in local groundwater.
- L4-7 In analyzing the proposed project, historic nitrogen loading rates were developed based on an analysis of treated effluent application to individual spray fields using a nutrient management tool (i.e. computer model). Daily irrigation flow rates used in the model were recorded in the field on a daily basis; the nitrogen and TDS concentrations were measured each week. For the purposes of this analysis, it was assumed that the concentrations are similar throughout the week. This assumption is considered reasonable and valid due to the small variation in the concentration data from week to week. The nitrogen concentration is multiplied by the flow to yield a mass rate of application pound/acre (lb/ac) per day. The same process was applied to the TDS data, which also results in a mass rate of TDS

application in lb/ac per day. Further, treatment plant upgrades are planned as part of a separate project, as stated on page 3.7-8 of Volume 3 of the DEIR.

Average daily values were calculated from 2007 through 2012 based on the treated effluent applied. The average value for nitrogen was 10 lb/ac per day. The average nitrogen loading was 13 lb/ac per year, with a peak month application of 47 lb/ac per month. The average value for TDS was 5 lb/ac per day. The average TDS loading was 9 lb/ac per year, with a peak month application of 50 lb/ac per month. These values (with few exceptions) are applied at agronomic rates (i.e., a rate that will achieve crop production goals) provided that grass (or other vegetation) is growing on the applied fields. Historic rates of TDS concentrations are below 450 mg/L, which is the average monthly effluent limitation for the storage ponds. At that level, there is no restriction on use for application of that recycled water. At these concentrations and loadings, there would be no effect on alfalfa at the proposed spray fields. Increasing loadings would not occur due to permit effluent limitations and state and federal water quality criteria. Therefore, land application of recycled water (at agronomic rates) is not anticipated to substantially affect groundwater quality.

- L4-8 The planned treatment plant improvements at MCSP will provide more reliable wastewater treatment in both hydraulic and solids treatment. These improvements are projected to result in reduction of concentrations of certain effluent constituents.

Based on the total population projections at MCSP with the proposed infill complex and the area of onsite spray fields that would remain and be used at MCSP, a water balance and nutrient balance spreadsheet was developed to determine the additional spray field area that would be required offsite to adequately accommodate MCSP's total wastewater discharge needs. The proposed agricultural spray fields would be in alfalfa production and would be relatively flat. Because of these conditions, these fields would be able to process a greater amount of treated effluent agronomically and hydraulically compared to the existing spray fields at MCSP, resulting in a reduction in total acreage needed. Please also refer to Response to Comment L4-7 regarding nutrient loading calculations.

- L4-9 While the commenter suggests that population trends at state prisons could exceed 200 percent design capacity, this is no longer considered a possible scenario. Historically, prisons populations have operated well above design capacity. However, several legal actions, including orders to reduce overcrowding by the US Supreme Court and other federal courts, have resulted in changes to the operation of the Statewide prison system, as noted in Section 2.1 of Volume 1 of the DEIR. As a result, the level of overcrowding that had occurred in the past at MCSP is not reasonably foreseeable. The supporting programs and services within each facility have been specifically designed and sized to accommodate the proposed inmate populations identified in Chapter 3 of Volume 1 of the DEIR.

With respect to MCSP's WWTP and previous Cease and Desist Orders, the Central Valley RWQCB has acknowledged the steps that CDCR has taken to ensure adequate treatment and capacity at MCSP's WWTP and has rescinded the cease and desist order that had been previously adopted by the RWQCB, as of July 30, 2013.

- L4-10 Refer to Response to Comment L4-9.

- L4-11 The Level II Infill Correctional Facilities Project, by siting potential new facilities adjacent to existing CDCR facilities, looks to take advantage of existing staff and facilities at the existing prisons to serve the proposed new facilities. These include administrative services as well as several support services. This would result in a lower per inmate wastewater generation rate, in and of itself. Further, CDCR is committed, as noted on page 3-13 of Volume 1 of the DEIR, to achieving LEED Silver or higher design standards at the new facilities. Part of the

LEED rating system pertains to water conservation and by achieving LEED Silver or better CDCR would be committed to reducing water consumption and wastewater generation. When CDCR initially built MCSP, many of the water conservation measures that the project will be able to take advantage of to reduce wastewater generation were not available.

- L4-12 The text in the second paragraph on page 3.12-8 of Volume 3 of the DEIR is revised as follows:

~~CDCR contracts with Amador County for solid waste disposal services. Amador County contracts the collection, transport, and disposal of solid waste to ACES Waste Services, Inc., a private solid waste disposal company located at 19801 Berry Street in Pine Grove. The area encompassing the infill site is currently served by ACES. Amador County has a residential recycling program in place for the entire County. In less heavily populated areas, colored recycling bags are provided by ACES for recycling pick up. Both programs accept a wide range of materials, do not require sorting, and are free to all customers.~~

- L4-13 CDCR has conducted waste recycling at all its prisons, including MCSP, for a number of years. This practice would be continued with the project. As stated in the second paragraph on page 3.12-16 in Volume 3 of the DEIR, “[t]he level II infill correctional facility complex would have its own recycling program ...” The inclusion of this recycling program would reduce the volume of project waste associated with implementation of the project. The generation rate of 3.6 pounds per inmate per day represents the expected amount of solid waste from the facility, including implementation of recycling programs (Impact 3.12-4a and b).

- L4-14 Introductory remarks are noted. No specific comments addressing the environmental analysis were raised in this comment.

- L4-15 Exhibit 3.11-6 (back and front) comprises pages 3.11-35 and 3.11-36 of Volume 3 of the DEIR. There is not a page-numbering error.

- L4-16 Table 3.11-13 of Volume 3 of the DEIR contains the Approved Projects for the Existing Plus Approved scenario, while Table 4-1 contains the projects assumed for Cumulative conditions. The two tables are not intended to match.

As stated on page 3.11-38 of Volume 3 of the DEIR, the approved projects listed in the Newman Ridge Quarry Traffic Impact Study (Abrams Associates, 2012) plus the Newman Ridge project itself were used to develop existing plus approved projects traffic volumes. This approach was confirmed with Amador County and ACTC. The Buena Vista Casino was not included as an approved project in the Newman Ridge study. Further, the Buena Vista Casino is not considered reasonably foreseeable as funding for the construction of the proposed casino has not been secured (Amador Ledger Dispatch 2013).

- L4-17 Please refer to Response to Comments S1-2 and S1-3. As described, Mitigation Measure 3.11-1 (DEIR Volume 3) requires CDCR to pay the City of Lone’s areawide transportation fees and Amador County’s regional transportation fee, and to negotiate a fair-share fee with ACTC for intersection improvements, which would consist of CDCR’s fair share contribution towards the installation of a traffic signal at the intersection of SR 104, SR 88, and Jackson Valley Road. The project’s share of traffic at the SR 88/104/Jackson Valley Road (east) intersection is estimated to be 3.6 percent. ACTC (and its member agencies) evaluates regional transportation needs, and determines which should be funded and why. CDCR’s consultant team met with ACTC staff during preparation of the DEIR. During that meeting it was confirmed that installation of a signal at the intersection of Jackson Valley Road/SR 104/SR 88 was not included in the RTP and there are no assurances it would be added to

the RTP (Field, pers. comm., 2013). Without an adopted fair share fee program (or any improvement programs) in place, payment of fees would not result in improvement to the intersection such that a less than significant impact would result. As shown in Response to Comment S1-2, Mitigation Measure 3.11-1 on page 3.11-27 of Volume 3 of the DEIR has been amended to more accurately reflect the fees that would be paid to the County and City. Please refer to Response to Comment L4-18 for a more detailed response to the County's statement regarding fair share contributions towards unplanned improvements.

- L4-18 Please refer to Responses to Comments S1-2, S1-3 and L4-17. Although CDCR would contribute fees, there is no assurance they would be used to improve the subject roadway. Further, the County already collects fees for regional improvements, which CDCR agrees it will pay. This type of improvement, a roadway to which CDCR contributes 0.8 percent of total traffic, is the type of improvement typically funded by a regional fee program. CDCR has no role in how ACTC allocates its priorities for funds, but clearly this is a roadway to which substantial traffic has been added by regional development. Nonetheless, CDCR will contribute a fair-share fee per negotiations with ACTC to mitigate the project's impact. As with all regional fee programs, the funds to be paid by CDCR are intended to fund the fair share connection to the project's transportation needs.
- L4-19 A stand-alone traffic impact study was not prepared; the full modeling results are included as an appendix to the DEIR.
- L4-20 Comment noted.

L5

Respectfully Submitted by

The City of Norco

July 23, 2013



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CITY OF NORCO RESPONSE
Environmental Impacts of the Proposed
Level II Infill Correctional Facilities Project

The draft Environmental Impact Report (the "draft DEIR") makes several assertions which the City of Norco disputes. The following summary is keyed to Chapter 6 of the DEIR (attached as Exhibit "A") which addresses the Norconian and which is attached to this report for convenient reference:

1. Assertion (Page 6-1, ¶1-1): Because the closure of the Norconian prison facility is a mandate from the State Legislature, the state asserts that the action is not subject to CEQA. (CEQA only applies when a "project" involves a "Discretionary Action" and the state is claiming here that its project is "Ministerial".)

Response: The closure of the prison is part of a larger discretionary action taken by the state legislature. Just because its implementation is mandatory, does not make the overall program ministerial. The larger context is the result of a discretionary action taken by the state legislature.

2. Assertion (Page 6-1, ¶1-3): Once closed, the CDCR will request funds to secure the property and provide property maintenance.

Response: Waiting until the facility is closed to try and secure funding is too late. If the funding is not secured, or if it is delayed, the site will be vulnerable to further deterioration, vandalism, and theft. Planning for the site's preservation must be an integral part of the action to close it.

3. Assertion (Page 6-1, ¶1-4): SB 1022 does not include any authority or funding to renovate any buildings and, therefore, the state claims there are no means to resolve existing issues of deterioration.

Response: The presence or lack of funds to mitigate a significant adverse change to a cultural resource is no foundation for not accomplishing mitigation measures.

4. Assertion (Page 6-1, ¶1-4): The report says "Post closure activities will be limited to (1) general property and landscape maintenance, (2) inspection of mechanical equipment and infrastructure, (3) placing temporary coverings on some street-level windows using nondestructive technique, and (4) securing the perimeter to prevent unauthorized entry, vandalism, and/or thief (sic)."

Response: The state has already allowed the landscaping around the Norconian hotel building to deteriorate or die; so promises of maintenance ring hollow. The types of security measures proposed are not sufficient to prevent further deterioration, vandalism, and theft. These can only be assured by the presence of adequate security personnel assigned to the property on a 24-hour basis and a specific maintenance plan spelling out the schedules and specifics relating to landscape irrigation/ maintenance, and facilities inspections and maintenance. A general promise to take care of the site is not sufficient.

L5-1

L5-2

L5-3

L5-4

L5-5

City of Norco Response
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 "Level II Correctional Facilities Project
 June 23, 2013

5. Assertion (Page 6-1, ¶-6): The state asserts that the closure of CRC Norco would not involve any alterations to existing structures or changes to the outward appearance of the facility. Maintenance of landscaping and buildings would continue to preserve the site's aesthetics. On this basis it claims there will be no aesthetic impacts from the closure of the prison.

Response: The lack of 24-hour staffed security would likely result in damage to the site and its buildings and theft. As proposed, therefore, adverse changes relating to aesthetics cannot be assured. Further, the state has already demonstrated a failure to maintain the historic buildings, landscaping, and improvements on the site, so there is no reason to believe anything will improve in this regard.

L5-6

6. Assertion (Page 6-3, ¶-4): The state claims that the closure involves no physical alterations to the site or any historic buildings and, therefore, CEQA does not apply.

Response: The closure *does* involve a physical change to the historic resource because it would leave a historic resource vulnerable to further deterioration, vandalism, and theft. Further, the state has failed since the abandonment of the hotel building in 2002 to maintain it and prevent its deterioration. The result is a building with gaping holes in its roof and many years of water and wildlife intrusion. Numerous expressions of concern about this deterioration and even offers to facilitate repairs have gone unanswered by the state. The state has a legal obligation to maintain its historic resources and the failure to maintain this resource must be remedied as part of the closure effort.

L5-7

7. Assertion (Page 6-3, ¶-5): The state claims the site's historic resources have already been fully surveyed in conjunction with the survey of the hotel-era improvements on the site and the subsequent designation of the hotel era improvements as a National Register listed Historic District.

Response: The site has *not* been thoroughly surveyed for historic resources. Since the listing of the property's hotel era improvements on the National Register, the property's heritage related to its use as a Naval hospital, weapons research facility, and as a drug rehabilitation institution have reached the 50-year-old mark normally used to determine which resources should be surveyed for historic significance. While the Navy is in the process of examining the site for its Naval hospital and weapons research related history, its report has been significantly delayed and no publication date has been announced. Further, the Navy's survey is not expected to include the drug rehabilitation history of the site. The property is long overdue for an updated cultural resources survey and evaluation and it is not possible to evaluate impacts to cultural resources in the absence of such a survey.

L5-8

City of Norco Response
Environmental Impact of the Proposed
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8. Assertion (Page 6-3, ¶7): The state advances the notion that age, weather, and other factors have led to the deterioration of the hotel building, with the result that it is now unsafe to enter to do repair work. This paragraph also repeats the assertion that there SB 1022 includes no funds or authority for repairs or renovations and, therefore, such work is not feasible. The continuation of this paragraph onto page 6-4 concludes that "Continued deterioration is therefore, expected." It goes on to say, however, that once the property "...is conveyed to other public agencies or private parties it may be subject to partial or complete renovation."

Response: The closure of the prison does not release the CDCR from its state mandated responsibility to maintain the historic resources under its control. The state has a responsibility to pass on to the next owner, a facility that is in good repair. As noted earlier, the lack of funding or authority in SB 1022 also does not absolve the prison from satisfying its responsibilities to maintain and protect the historic resources under its stewardship. To say that continued deterioration is a foregone conclusion is unacceptable. The state is obligated by its own rules to make sure the building is kept in good condition and that future deterioration will be prevented. Further, there is no objective evidence to support the notion that the building is unsafe to enter for the purpose of making repairs. And, it seems contradictory to suggest another public agency or private entity could restore the building if it is, indeed, unsafe to enter.

L5-9

City of Norco Response
Environmental Impact of the Proposed
"Level II Correctional Facilities Project
June 23, 2013

Exhibit "A" of City of Norco Response

**California Department of Corrections and Rehabilitation Volume 1
Level II Infill Correctional Facilities Project EIR 6-1**

**Chapter 6 CLOSURE OF CALIFORNIA
REHABILITATION CENTER, NORCO**

6 CLOSURE OF CALIFORNIA REHABILITATION CENTER, NORCO

As mandated by Senate Bill (SB) 1022, the "Department of Corrections and Rehabilitation shall remove all inmates from, cease operations of, and close the California Rehabilitation Center located in Norco, California, no later than either December 31, 2016, or six months after construction of the three Level II dorm facilities authorized in Section 14 of this act, whichever is earlier." Because the Legislature has required closure of the CRC, CDCR has no discretion; thus, closure related activities are not subject to CEQA.

As noted in CDCR's Blueprint, closure of CRC is considered necessary "due to its age, dilapidated condition, and high operating costs" (CDCR 2012). SB 1022 specifically directs CDCR to close CRC and relocate its current inmate population, regardless of other planning activities with respect to level II infill correctional facilities.

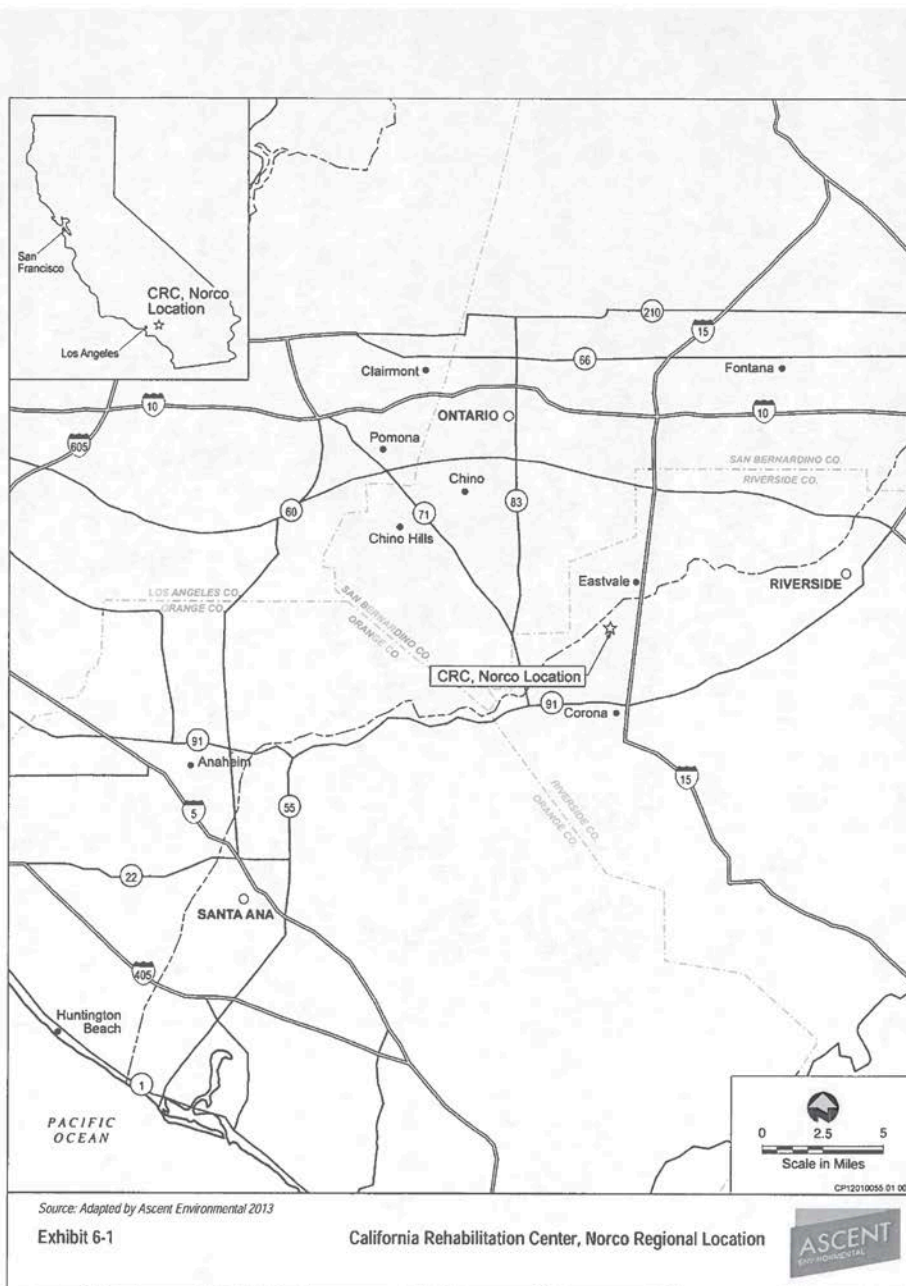
CRC is located at Fifth Street and Western Avenue in the City of Norco, as depicted in Exhibit 6-1. Once closed, CDCR would request the personnel and budgetary resources to secure the property and buildings, as well as provide necessary property maintenance. CRC currently houses approximately 3,400 level II inmates that would have to be transferred to other appropriate correctional facilities. By mid-2016, the prison's population is reasonably expected to be lower due to recent changes in sentencing and in anticipation of the pending closure of CRC (CDCR 2013). CDCR has no plans for future development or use of the CRC site as a prison. CDCR anticipates that at some future date the property will be declared surplus through legislation. At that time the property would be transferred to the California Department of General Services who will be responsible for disposal of the property consistent with governing statutes. Typically surplus state property will be conveyed to either local agencies and/or the private owners.

SB 1022 does not grant CDCR the authority to plan or make any modifications to buildings within the property. There is no funding available to make renovations or otherwise modify the existing structures. Upon sale/transfer to a local agency or private party(s) the CRC property would be subject to the planning and building permit review of the City of Norco. Accordingly, future use and/or renovation of the CRC site, either by public or private entities, is speculative and therefore not evaluated in this EIR. No onsite structures would be modified or demolished as part of the project. Post closure activities will be limited to (1) general property and landscape maintenance, (2) inspection of mechanical equipment and infrastructure, (3) placing temporary coverings on some street-level windows using a non-destructive technique, and (4) securing the perimeter to prevent unauthorized entry, vandalism, and/or theft.

Although closure of CRC is not a discretionary approval of a project, as defined by CEQA, and is therefore exempt from CEQA, the reasonably foreseeable potential impacts associated with closure as described in the previous paragraph are discussed below in a good faith effort at full disclosure.

6.1 AESTHETICS

The warm closure of CRC would result in the relocation of existing inmates to other CDCR prisons but would not involve any alterations to existing structures or changes to the outward appearance of the facility. Building and landscaping maintenance would continue to maintain the visual character and scenic quality of the site. No new structures, including those that could contribute to new sources of light and/or glare, would be installed as part of the warm closure. Thus, no changes to the visual appearance of the facility would occur and there would be no adverse changes related to aesthetics.



6.2 AGRICULTURAL AND FORESTRY RESOURCES

All existing land uses would remain unchanged with warm closure at CRC. No agricultural or forest lands are on or adjacent to the site. There would be no conversion of any forest or agricultural land to other uses.

6.3 AIR QUALITY

The warm closure would involve the relocation of a maximum of 3,443 inmates to various CDCR prisons throughout California. Transfer of inmates would be conducted in accordance with CDCR's existing inmate transfer system, and therefore is not considered a part of the proposed project requiring evaluation under CEQA. Air emissions associated with operation of the site (e.g., vehicle trips) would be substantially decreased upon its closure. Overall, the warm closure of CRC would not result in any short-term or long-term adverse changes to air quality.

6.4 BIOLOGICAL RESOURCES

Maintenance activities within areas surrounding the facility would continue under the warm closure, in a similar capacity as under existing conditions. Thus, the physical conditions of the site would not be altered (e.g., by tree removal, structural alteration, or other construction activities) and no sensitive biological resources would be affected.

6.5 CULTURAL RESOURCES

The warm closure of CRC would involve the relocation of the existing inmates to other CDCR prisons statewide. No surveys of the existing structures were performed as part of this evaluation because no modifications to the existing structures would occur. As noted above, SB 1022 does not grant CDCR the authority to plan or modify the existing structures at CRC. Because no ground-disturbing activities would occur and no buildings would be modified, there would be no activities that could affect historical, archaeological, and/or paleontological resources or human remains.

Nonetheless, the CRC site is known to contain buildings that are part of the Lake Norconian Historic District, which is listed in the National Register of Historic Places (NRHP). The site has been thoroughly documented, including with archival photographs and a detailed history. For more information, please see <http://nrhp.focus.nps.gov/natregsearchresult.do?fullresult=true&recordid=0>; <http://pdfhost.focus.nps.gov/docs/NRHP/Text/00000033.pdf>; and <http://pdfhost.focus.nps.gov/docs/NRHP/Photos/00000033.pdf>.

The district includes a resort with an ornate hotel building originally opened in 1929. In its early years, the resort was frequented by many celebrities of the period, but fell into hard times during the Depression. In 1941, after the bombing of Pearl Harbor, the resort was converted to the United States Naval Hospital. In 1963, part of the resort, including the hotel building and barracks constructed in World War II, became the California Rehabilitation Center. In 2000, the hotel and other buildings were deemed eligible for listing on the NHRP as part of the larger Lake Norconian historic district. In 2002, the State concluded the hotel building was seismically unfit and too expensive to retrofit, and abandoned it. (Lake Norconian Club Foundation, ND)

Over the past several years the hotel buildings have continued to deteriorate due to age, weather, and many other factors. A consequence of this deterioration is that the structure is now unsafe to enter or to modify even exterior elements such as the roofs. SB 1022 did not include any funding for repair and/or rehabilitation of the hotel; CDCR has no other source of repair funds that can be diverted to such potential repairs in light of other departmental maintenance and repair priorities. Given the absence of authorized funding for preservation of the structure it is not feasible for CDCR to undertake any

activities associated with rehabilitation of the building. Continued deterioration is therefore expected. Once the site is declared surplus and it is conveyed to other public agencies or private parties it may be subject to partial or complete renovation. However, such potential modifications would be subject to local planning and building permit ordinances. Accordingly, the future use of the buildings and property is not reasonably foreseeable and any attempt to consider such uses or alternatives would be purely speculative.

6.6 GEOLOGY AND SOILS

There would be no construction of new facilities or ground-disturbing activities related to closure that could expose people or structures to unsafe conditions. Thus, there would be no effects associated with geology and soils.

6.7 GREENHOUSE GAS EMISSIONS

General maintenance activities would continue at the site; however, activities at CRC that generate greenhouse gas (GHG) emissions (e.g., vehicle trips) would be substantially reduced from existing conditions. Thus, there would be no adverse effects as a result of the warm closure of CRC related to project-driven increases in GHG emissions.

6.8 HAZARDS AND HAZARDOUS MATERIALS

While general maintenance activities would continue at the site, possibly including the use of hazardous chemicals such as fertilizers and pesticides, they would continue to be handled, stored, and used consistent with applicable regulations governing their transportation, storage, and use. Project-related activities at CRC would not include the construction of new structures or other ground disturbance, but would remove people from the site; therefore, closure of this facility would decrease the exposure of people or structures to wildfires, compared to existing conditions. No buildings would be altered and no other activities that could result in exposure to hazards or hazardous materials would occur.

6.9 HYDROLOGY AND WATER QUALITY

The warm closure of CRC does not include any construction or modification to buildings; water bodies; or areas subject to flooding, seiche, tsunami, or mudflow. Inmates would be removed from the site, reducing any risk from exposure to any such hazards. No physical modifications would occur onsite that could otherwise modify existing drainage patterns or result in temporary or permanent changes to local or regional water quality.

6.10 LAND USE AND PLANNING

Relocation of inmates from CRC and closure of the facility would not include physical changes to the environment that could disrupt an established community because no new structures would be built and all activities would occur within an existing developed site. Because the warm closure would include maintenance of the grounds and facilities, there would be no change to the land use of the site; therefore, there would be no adverse effects related to consistency with applicable land use policies or other environmental land use regulations. As noted above, the property may be designated as surplus by the State at a later date, making it available to other agencies and/or interested private parties, but that action is not included as part of the proposed project. Any changes to land use that would be undertaken by a future purchasing entity would be subject to a separate evaluation of environmental impacts under CEQA.

6.11 MINERAL RESOURCES

No construction activities or physical modifications to the site would occur, and the availability of existing mineral resources would not be affected.

6.12 NOISE

Noise associated with the closure would be limited to bus trips to transport inmates during the closure period (temporary basis) and periodic maintenance-related noise (e.g., mowers), which would be substantially less frequent than under current conditions. Thus, the closure would not increase exposure of people to noise or vibration.

6.13 POPULATION AND HOUSING

The warm closure would not involve an increase in capacity or staffing needs at CRC that would necessitate the construction of housing or induce population growth, directly or indirectly..

6.14 PUBLIC SERVICES

Closure of CRC would reduce onsite population levels, thereby reducing any demand for public services (e.g., police, fire, emergency response) heretofore assigned to respond to requests for such service. CRC would be maintained as a secure facility, thereby preventing potential need for emergency services related to vandalism or trespassing.

6.15 RECREATION

Closure of CRC would not result in staffing increases or other population influx to the area. Thus, impacts related to population increases, such a demands for additional recreational facilities, would not occur.

6.16 TRANSPORTATION AND TRAFFIC

Staffing at CRC would be reduced, thereby reducing local traffic volumes related to daily staff commutes, visitor trips, and supply deliveries. During the closure period (temporary basis), bus trips would transport inmates to other CDCR facilities. However, the transfer of inmates would be conducted gradually and in accordance with CDCR's existing inmate transfer system. Closure of the facility would be expected to result in a long-term decrease in traffic; thus, no adverse effects on adopted policies, plans, and programs would be expected.

6.17 UTILITIES AND SERVICE SYSTEMS

Demand for utilities and service systems would be limited to maintenance-related activities and would be substantially reduced compared to existing conditions.

Evaluation of Closure of CRC, Norco

Ascent Environmental

This page intentionally left blank.

NPS Form 10-900-a
(8-86)

OMB Approval No. 1024-0018

United States Department of the Interior
National Park Service**National Register of Historic Places
Continuation Sheet**

Section number _____ Page _____

SUPPLEMENTARY LISTING RECORD

NRIS Reference Number: 00000033

Date Listed: 2/4/2000

Lake Norconian Club
Property NameRiverside CA
County StateN/A
Multiple Name

This property is listed in the National Register of Historic Places in accordance with the attached nomination documentation subject to the following exceptions, exclusions, or amendments, notwithstanding the National Park Service certification included in the nomination documentation.

Pat R. Lopez
x Signature of the Keeper

2/4/00
Date of Action

Amended Items in Nomination:

Significance:*Criterion B* is deleted and *Criterion C* is added.

[The current nomination fails to adequately justify the significance of any persons directly associated with this property.]

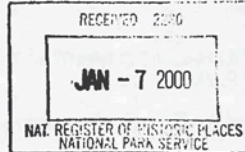
The nomination does provide sufficient information to justify the significance of the property in the area of *Architecture*, as a fine example of Southern California resort architecture rendered in the regional Spanish Colonial Revival style.

These revisions were confirmed with M. Lortie of the CA SHPO.

DISTRIBUTION:National Register property file
Nominating Authority (without nomination attachment)

NPS Form 10-900
(Oct. 1990)

OMB No. 10024-0018

United States Department of the Interior
National Park ServiceNational Register of Historic Places
Registration Form

This form is for use in nominating or requesting determinations for individual properties and districts. See instructions in *How to Complete the National Register of Historic Places Registration Form* (National Register Bulletin 16A). Complete each item by marking "x" in the appropriate box or by entering the information requested. If an item does not apply to the property being documented, enter "N/A" for "not applicable." For functions, architectural classification, materials, and areas of significance, enter only categories and subcategories from the instructions. Place additional entries and narrative items on continuation sheets (NPS Form 10-900a). Use a typewriter, word processor, or computer, to complete all items.

1. Name of Property

historic name Lake Norconian Club
other names/site number N/A

2. Location

street & number Southeast corner of Fifth and Western Ave (P.O. Box 1841) ☐ not for publication
city or town Norco ☐ vicinity
state California code CA county Riverside code 065 zip code 91760

3. State/Federal Agency Certification

As the designated authority under the National Historic Preservation Act, as amended, I hereby certify that this ☒ nomination
☐ request for determination of eligibility meets the documentation standards for registering properties in the National Register of
Historic Places and meets the procedural and professional requirements set forth in 36 CFR Part 60. In my opinion, the property
☐ meets ☐ does not meet the National Register criteria. I recommend that this property be considered significant
☐ nationally ☐ statewide ☒ locally. (☐ See continuation sheet for additional comments.)

David A. [Signature] 12-17-99
Signature of certifying official/Title Date
California Office of Historic Preservation
State of Federal agency and bureau

In my opinion, the property ☐ meets ☐ does not meet the National Register criteria. (☒ See continuation sheet for additional comments.)

Signature of commenting official/Title Date
State or Federal agency and bureau

4. National Park Service Certification

I hereby certify that the property is:

- ☒ entered in the National Register.
☐ See continuation sheet.
☐ determined eligible for the
National Register
☐ See continuation sheet.
☐ determined not eligible for the
National Register.
☐ removed from the National
Register.
☐ other, (explain): _____

[Signature] 2/4/00
Signature of the Keeper Date of Action

| <u>Lake Norconian Club</u> Name of Property | | <u>Riverside, California</u> County and State | | | | | | | | | | | | | | | | | | | |
|---|--|---|--|--------------|-----------------|--|---|---|-----------|---|--|-------|---|---|------------|--|--|---------|----|---|-------|
| 5. Classification | | | | | | | | | | | | | | | | | | | | | |
| Ownership of Property (Check as many boxes as apply) | Category of Property (Check only one box) | Number of Resources within Property (Do not include previously listed resources in the count.) | | | | | | | | | | | | | | | | | | | |
| <input type="checkbox"/> private <input type="checkbox"/> public-local <input checked="" type="checkbox"/> public-State <input checked="" type="checkbox"/> public-Federal | <input type="checkbox"/> building(s) <input checked="" type="checkbox"/> district <input type="checkbox"/> site <input type="checkbox"/> structure <input type="checkbox"/> object | <table style="width: 100%; border-collapse: collapse;"> <tr> <th style="text-align: left; width: 50%;">Contributing</th> <th style="text-align: left; width: 50%;">Noncontributing</th> <th></th> </tr> <tr> <td style="text-align: center;">7</td> <td style="text-align: center;">1</td> <td>buildings</td> </tr> <tr> <td style="text-align: center;">1</td> <td></td> <td>sites</td> </tr> <tr> <td style="text-align: center;">5</td> <td style="text-align: center;">3</td> <td>structures</td> </tr> <tr> <td></td> <td></td> <td>objects</td> </tr> <tr> <td style="text-align: center;">13</td> <td style="text-align: center;">4</td> <td>Total</td> </tr> </table> | | Contributing | Noncontributing | | 7 | 1 | buildings | 1 | | sites | 5 | 3 | structures | | | objects | 13 | 4 | Total |
| Contributing | Noncontributing | | | | | | | | | | | | | | | | | | | | |
| 7 | 1 | buildings | | | | | | | | | | | | | | | | | | | |
| 1 | | sites | | | | | | | | | | | | | | | | | | | |
| 5 | 3 | structures | | | | | | | | | | | | | | | | | | | |
| | | objects | | | | | | | | | | | | | | | | | | | |
| 13 | 4 | Total | | | | | | | | | | | | | | | | | | | |
| Name of related multiple property listing (Enter "N/A" if property is not part of a multiple property listing.) | | Number of contributing resources previously listed in the National Register | | | | | | | | | | | | | | | | | | | |
| N/A | | N/A | | | | | | | | | | | | | | | | | | | |
| 6. Function or Use | | | | | | | | | | | | | | | | | | | | | |
| Historic Functions (Enter categories from instructions) | | Current Functions (Enter categories from instructions) | | | | | | | | | | | | | | | | | | | |
| <u>Domestic/Hotel</u> <u>Commercial/Restaurant</u> <u>Health Care/Hospital</u> <u>Industry/Energy facility</u> | | <u>Government/Correctional Facility</u> <u>Defense/Naval facility</u> | | | | | | | | | | | | | | | | | | | |
| 7. Description | | | | | | | | | | | | | | | | | | | | | |
| Architectural Classification (Enter categories from instructions) | | Materials (Enter categories from instructions) | | | | | | | | | | | | | | | | | | | |
| <u>Late 19th and 20th Century</u> <u>Revivals/Spanish Colonial Revival</u> | | foundation <u>Stone</u> walls <u>Stucco, Wood</u> roof <u>Tile</u> other | | | | | | | | | | | | | | | | | | | |
| Narrative Description (Describe the historic and current condition of the property on one or more continuation sheets.) | | | | | | | | | | | | | | | | | | | | | |
| Please see continuation sheet | | | | | | | | | | | | | | | | | | | | | |

| | |
|---|--|
| <u>Lake Norconian Club</u> <small>Name of Property</small> | <u>Riverside, California</u> <small>County and State</small> |
| 8. Statement of Significance | |
| Applicable National Register Criteria <small>(Mark "x" in one or more boxes for the criteria qualifying the property for National Register listing.)</small> | Areas of Significance <small>(Enter categories from instructions)</small> |
| <input checked="" type="checkbox"/> A Property is associated with events that have made a significant contribution to the broad patterns of our history. | <u>Architecture</u> <u>Exploration/Settlement</u> |
| <input checked="" type="checkbox"/> B Property is associated with the lives of persons significant in our past. | |
| <input type="checkbox"/> C Property embodies the distinctive characteristics of a type, period, or method of construction or represents the work of a master, or possesses high artistic values, or represents a significant and distinguishable entity whose components lack individual distinction. | |
| <input type="checkbox"/> D Property has yielded, or is likely to yield, information important in prehistory or history. | |
| Criteria Considerations <small>(Mark "x" in all the boxes that apply.)</small> | Period of Significance <u>1928-1941</u> |
| Property is: | Significant Dates <u>N/A</u> |
| <input type="checkbox"/> A owned by a religious institution or used for religious purposes. | |
| <input type="checkbox"/> B removed from its original location. | Significant Person <small>(Complete if Criterion B is marked above)</small> <u>N/A</u> |
| <input type="checkbox"/> C a birthplace or grave. | Cultural Affiliation <u>N/A</u> |
| <input type="checkbox"/> D a cemetery. | |
| <input type="checkbox"/> E a reconstructed building, object, or structure. | |
| <input type="checkbox"/> F a commemorative property. | |
| <input type="checkbox"/> G less than 50 years of age or achieved significance within the past 50 years. | Architect/Builder <u>Wilson, G. Stanley</u> <u>Gibbs, Dwight</u> |
| Narrative Statement of Significance <small>(Explain the significance of the property on one or more continuation sheets.)</small> | |
| 9. Major Bibliographical References | |
| Bibliography <small>(Cite the books, articles, and other sources used in preparing this form on one or more continuation sheets.)</small> | |
| Previous documentation on file (NPS): | Primary location of additional data: |
| <input type="checkbox"/> preliminary determination of individual listing (36 CFR 67) has been requested <input type="checkbox"/> previously listed in the National Register <input type="checkbox"/> previously determined eligible by the National Register <input type="checkbox"/> designated a National Historic Landmark <input type="checkbox"/> recorded by Historic American Buildings Survey # _____ <input type="checkbox"/> recorded by Historic American Engineering Record # _____ | <input type="checkbox"/> State Historic Preservation Office <input type="checkbox"/> Other State agency <input type="checkbox"/> Federal agency <input checked="" type="checkbox"/> Local government <input type="checkbox"/> University <input checked="" type="checkbox"/> Other NWAS and Norco Historical Society Name of repository: _____ |

| | |
|---------------------|-----------------------|
| Lake Norconian Club | Riverside, California |
| Name of Property | County and State |

10. Geographical Data

Acreage of Property 92 acres

UTM References
(Place additional UTM references on a continuation sheet.)

| | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | | |
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| 1 <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>1</td><td>1</td></tr><tr><td>Zone</td><td>Easting</td></tr></table> <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>4</td><td>4</td><td>7</td><td>3</td><td>7</td><td>5</td></tr><tr><td colspan="6">Northing</td></tr></table> <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>3</td><td>7</td><td>5</td><td>4</td><td>2</td><td>1</td><td>3</td></tr><tr><td colspan="7">Northing</td></tr></table> | 1 | 1 | Zone | Easting | 4 | 4 | 7 | 3 | 7 | 5 | Northing | | | | | | 3 | 7 | 5 | 4 | 2 | 1 | 3 | Northing | | | | | | | 3 <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>1</td><td>1</td></tr><tr><td>Zone</td><td>Easting</td></tr></table> <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>4</td><td>4</td><td>7</td><td>6</td><td>6</td><td>0</td></tr><tr><td colspan="6">Northing</td></tr></table> <table border="1" style="display: inline-table; vertical-align: middle;"><tr><td>3</td><td>7</td><td>5</td><td>3</td><td>5</td><td>2</td><td>0</td></tr><tr><td colspan="7">Northing</td></tr></table> | 1 | 1 | Zone | Easting | 4 | 4 | 7 | 6 | 6 | 0 | Northing | | | | | | 3 | 7 | 5 | 3 | 5 | 2 | 0 | Northing | | | | | | | |
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☐ See continuation sheet

Verbal Boundary Description
(Describe the boundaries of the property on a continuation sheet.)

Boundary Justification
(Explain why the boundaries were selected on a continuation sheet.)

11. Form Prepared By

name/title Pamela Ensley, Adm. Asst. Dr. Knox Mellon and Pam O'Connor of Mellon & Assoc.

organization City of Norco date 9/28/98

street & number 2870 Clark Ave. (P.O. Box 428) telephone (909) 735-3900

city or town Norco state CA zip code 91760

Additional Documentation
Submit the following items with the completed form:

Continuation Sheets

Maps

A USGS map (7.5 or 15 minute series) indicating the property's location.

A Sketch map for historic districts and properties having large acreage or numerous resources.

Photographs

Representative black and white photographs of the property.

Additional items
(Check with the SHPO or FPO for any additional items)

Property Owner
(Complete this item at the request of SHPO or FPO.)

name California Rehabilitation Center & Naval Warfare Assessment Station

street & number P.O. Box 1841 & P.O. Box 5000 telephone (909) 737-2683 & 273-5123

city or town Norco state CA zip code 91760

Paperwork Reduction Act Statement: This information is being collected for applications to the National Register of Historic Places to nominate properties for listing or determine eligibility for listing, to list properties, and to amend existing listings. Response to this request is required to obtain a benefit in accordance with the National Historic Preservation Act, as amended (16 U.S.C. 470 et seq.).

Estimated Burden Statement: Public reporting burden for this form is estimated to average 18.1 hours per response including time for reviewing instructions, gathering and maintaining data, and completing and reviewing the form. Direct comments regarding this burden estimate or any aspect of this form to the Chief, Administrative Services Division, National Park Service, P.O. Box 37127, Washington, DC 20013-7127; and the Office of Management and Budget, Paperwork Reduction Projects (1024-0018), Washington, DC 20503.

NPS Form 10-900a

OMB Approval No. 1024-1118

United States Department of the Interior
National Park Service**National Register of Historic Places
Continuation Sheet**Section 5, Page 1Lake Norconian Club
Riverside County, CA**Explanation of Resource Count**

Contributing buildings:

- Hotel/club
- Teahouse
- Power Plant
- Laundry/Garage
- Casino/Pavilion
- Boathouse
- Maids' Quarters

Contributing site: Includes man-made lake and historic landscaping

Contributing structures:

- Footbridge
- Smokestack
- 2 Gazebos
- Gas Station Island

Non-contributing building: Modern screening facility for prison

Non-contributing structures: Three modern guard towers for prison

NPS Form 10-900a

OMB Approval No. 1024-1118

United States Department of the Interior
National Park Service**National Register of Historic Places
Continuation Sheet**Section 3 Page 1Lake Norconian Club
Riverside County

Federal Agency Certification:

In my opinion, the property ☒ meets ___ does not meet the National Register
criteria.

Signature of certifying official/Title

24 November 1999
DateDEPARTMENT OF THE NAVY
State or Federal agency and bureau

United States Department of the Interior
National Park Service

National Register of Historic Places Continuation Sheet

LAKE NORCONIAN CLUB
FIFTH STREET
CITY OF NORCO
RIVERSIDE COUNTY
CALIFORNIA 91760

Section number 7 Page 1

Lake Norconian Club

For National Register Nomination

Section 7: Description

Site

The Norconian Club/Hotel is sited on a ridge overlooking an expansive valley, providing sweeping views of distant mountains. The main building, the Club/Hotel, was built into the hillside offering picturesque vistas including that of the man-made 58-acre Lake Norconian. The main entrance to the hotel was organized around a central landscaped forecourt which leads to an outdoor terrace with enclosed tea room on its lower level. Extensive landscaped grounds led to the Lake, casino and boathouse to the south. The original 700 acre parcel included sulfur hot springs which are still extant. The grounds have been subdivided: the northern portion is controlled by the State of California as the California Rehabilitation Center (CRC) and the southern portion by the U.S. Navy.

Although the parcel has been subdivided, buildings added, (including guard towers, pedestrian clearance/security building), relandscaped, with major security systems added to accommodate the hotel's reuse as a rehabilitation facility, remnants of original landscaping and pathway from the hotel/teahouse remain, including a stonework footbridge near the lake.

The hotel forecourt garden, defined by the "U" shaped plan of the building's western segment, retains much of its original form and plantings. A central paved walk leads to the Hotel's main entrance and is bisected by a grassy median. The walk flares out to widen at the base of the entry stairs. Two diagonal paved walks radiate off the main walkway towards the inner corners of the "U". Mature palms trees grace the manicured lawn. Trees are paired, with one of each set planted on either side of the central walkway. Other landscaping includes mature evergreens and miscellaneous bushes.

The 204,000 square foot hotel/club building is 6 levels and irregular in plan. The three lowest levels (gym, basement and sub-basement) are partial floors and built down slope. Three other floors, main, second and third, rise above the main entrance at the crown of the hill. This

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segment of the building is "U" shaped in plan with a central (north-south) wing connecting two perpendicular wings, designed to hold guest rooms. To the south another segment of the building contains four floors of public rooms, such as the dining hall. These public rooms were located here to take advantage of sweeping vistas to the south. Another segment of the building is located to the east. This rectangular (in plan) section holds the Olympic size swimming pool and spectator area as well as service/support areas for hotel operations.

To the northeast of the hotel/club is the power plant and smoke tower on the California Rehabilitation Center (CRC) grounds. To the east, on axis with the hotel/club is the laundry and garage building. Part of the Navy facility, this building, though visible, is separated by high fences and security equipment. To the south of the hotel/club, and downhill, is the footbridge which leads to the casino/pavilion and boat house both sited on the banks of Lake Norconian.

During World War II, when the Navy took control of the grounds, additional buildings were constructed to support hospital and rehabilitation requirements. When the grounds were split into two parcels, additional changes occurred. The hotel/club, tea room and power plant came under control of the California Rehabilitation Center (CRC) of the State of California and major security and access control systems were installed. The grounds of the CRC are highly controlled and totally fenced off. The Navy parcel which contains the garage/laundry building, casino/pavilion, boathouse and footbridge has also evolved over the decades. While the open space between the hotel/club building and the lake and casino/pavilion remains, the landscaping and pathway definition has not been maintained in its original configuration. Additional buildings have been constructed on the parcel but lie to the east of the casino/pavilion and lake Norconian, separated by a roadway. Thus, although historic landscaping has not been maintained, the open space and visual access between the hotel/club building, lake, and casino/pavilion remain. Non-contributing features included within the historic district include three security guard towers, perimeter fencing and a pedestrian clearance building where guards screen visitors into the facility.

Hotel/Club Exterior

The Norconian Club/Hotel was designed in the Spanish Colonial Revival style. The design of the monumental building uses sculptural volumes to break up the building into separate, smaller shapes which spread informally over the site. The building's original massing is basically intact. Churrigueresque ornamentation of cast stone is used to distinguish the exterior of special areas such as the main entry facade and assembly spaces such as the dining hall and gym/ballroom.

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The exterior is sheathed in stucco with cast stone ornamentation. The main entry is located at the center of the "U" shaped wing. Although the building is asymmetrical in massing, the front entry facade and guest room wings sport symmetrical elevations. The central entry bay juts out and rises almost two stories higher than the main building. This entry features an arcade with three arched openings. The pilasters that divide these arches rise two stories and are connected by cast stone ornamentation which mimics arches of the entry arcade. A cross gable roof of clay tile is visible to either side of the tower. The tower rises another two stories with a pair of pilasters on either side of an oriel window. The tower is capped by a hipped roof of clay tile. The entrance loggia features transverse arched ceiling, tile flooring, original light fixtures, wooden entry doors, and arched windows with sidelights and transoms.

The guest room wings flank the garden forecourt and are mirror images of each other. Windows are grouped in sets of pairs at times alternating with a shorter, single window. The same window treatment is used at each floor creating a vertical unity. In contrast to this verticality, horizontal string window sills and header courses define the third floor windows. A three bay section juts out of each guest room wing at the westernmost end. This more decorative section features two sets of paired French doors which open onto balconies; a pair of regular windows are located between each set of French doors. Balconies at the second and third floor sport iron rails while the balcony on the lowest floor is stucco coated.

The south facade of the building features asymmetrical massing and a highly articulated facade. Churrigueresque cast stone details and deep window and door surrounds distinguish the exterior of assembly rooms located on this elevation. Some of the assembly rooms, such as the dining room, feature large fixed pane windows to provide views to the site's expansive grounds and distant vistas. Outside the Dining Room, as well as in other areas, bas-relief ornaments with floral and aquatic motifs are set into stucco walls. A drive through covered roadway is located along the south facade.

The rear (east) elevation of the building is defined by two "pool towers" which rise several stories and are capped with a cupola. A loggia leads to the outdoor pool courtyard, Olympic size pool and seating area.

Throughout the exterior classic Spanish Colonial Revival elements are employed and ornamentation applied. These include: prominent arches, low pitch clay tile roofs; little eave overhang; wrought iron balconies and grills, wood sash casement windows; French doors; and glazed ceramic tile ornamentation.

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Most of the exterior alterations are located away from principal facades. Building alterations include: new exit stair tower at east end of south wing; infill of north courtyard with offices; pedestrian bridge to new adjacent building; 2-story shed addition on south facade of southern end; one-story shed addition to east; small shed southwest of pool courtyard area; addition to northwest of outdoor pool; Quonset hut enclosure near pool area. The club/hotel is on the CRC grounds.

Hotel/Club Interior

Although the Norconian Club/Hotel main building has undergone adaptation to support hospital administration and correctional facility programming, many interior spaces retain original features.

The main lobby area contains an arrangement of square concrete columns and beams painted to give the impression of wood texture. An arched entry to the main elevator lobby features a keystone and voussoirs with alternating horizontal and vertical ribbing, a combination repeated at the main stairway. Other features include: Spanish tile in weave pattern and small squares; tile wainscoting at reception desk; pendant lantern; wave form tile-base; tile on stair risers; fixed plate glass picture window; and semi-circular windows with transom. Minor alterations include conversion of a gift shop into an office and remodeling of reception desk area.

The main corridor connects the main lobby to the outdoor pool, passing through the main elevator lobby, descending slightly, then passing through the former bar area. The corridor features a barrel vaulted ceiling and flush skylights with stained glass and pendant lamps. Steps have been replaced with a ramp and the former bar area partitioned off.

The corridor from the lobby to the dining hall features ceilings and walls finished with finger textured plaster, floor and base of Spanish tile with decorative wave patterned trim, original lighting fixtures and niches for fountains.

An elevator lobby forms the entrance antechamber to the dining hall. It is visually linked to the hall by a checkerboard marble floor. It employs geometric patterns in coffered ceilings and decorative ceiling boards. Decorative brass gates lead into the dining hall.

The dining hall is one of the most decorative spaces in the Norconian Club/Hotel. Encompassing a large area, it offers panoramic views of Lake Norconian and mountains in the distance.

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Remarkably intact, it has functioned as a dining hall through all ownership changes. Entrance to the room is from a low-ceiling antechamber which helps accentuate the vastness of the dining hall. The hall features a quadripartite series of arches which support stenciled roof trusses and its pitched ceiling. The floor is marble in a checkerboard pattern. An orchestra balcony projects over the North entrance. Decorative ironwork (railings, grills, gates) as well as artwork applied to intrados and chandeliers and wall sconces still grace the room. Only a few alterations have occurred and are reversible: addition of security screens on windows and removal of original wall tapestries.

The south lobby provides entry to the gym, which was originally a ballroom. A barrel vaulted ceiling features outstanding artwork and a mural above the corridor doorway depicts a scene from a Renaissance masquerade. Decorative ceramic tile wainscoting and patterned Spanish floor tiles are used throughout the room. Pendant lanterns and grills as well as a variety of windows (paired casements, concentric semi-circle with transom and sidelights) also grace the lobby. Alterations are minimal; one original opening to a west waiting room has been filled in.

The gym/ballroom incorporates an orchestra stage and makes dramatic use of interplay between heavy ceiling joist girders and flanking nave arcades. Lattice ventwork below girders creates interesting architectural elements. Semi-circular windows mimic the pattern of the arcade. Early Renaissance style stenciled artwork is painted on girders, joists and frieze. Wall sconces, pendant lanterns, ceiling lamps and grill work also grace the room. Alterations are limited and include one filled in window opening (a result of addition of exterior stairs) and an exterior ramp installed at southeast exit. Some florescent ceiling fixtures have been added and two original pendant lanterns replaced.

The former music room features a pitched ceiling accentuated by large scale beams and girders. Recessed balconies are located at the north end. Elaborate artwork is stenciled on ceiling and joist railings. The fireplace design includes a void above the hearth. Alterations include a full height partition which divides the room. An office in the southeast corner filled in an original arched opening. Florescent lights and a circular stairway have been added.

A network of service corridors support building functions and vary in terms of alterations. The most intact service corridor is located north of the telephone booth area of the south lobby, wrapping along the north and west edges of the gym/ballroom. Plaster walls have light texture, floorings is checkerboard linoleum, and original light fixtures retained.

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Both indoor pools, the south and north, remain. The south pool is the most intact and imparts the essence of the spa that the Norconian Club/Hotel aspired to be. A barrel vaulted skylight and clerestories provide natural light. The pool features tile wainscoting. A corridor with arcade is now filled in with panels. Other alterations include addition of glass partitions to separate pool from splash zone and decking over of pool (potentially reversible). The north pool has been heavily altered and transformed into a modern conference room. The only remaining original elements include a portion of a barrel vaulted skylight and tile wainscoting in the perimeter corridor.

Several original guest room designs were featured. The typical suite with balcony included a pair of French doors and casement windows. Suites without balconies had four casement windows. Typical guestrooms feature a pair of casement windows and smaller bathroom and closet. All the corner suites have been altered. Generally, alterations have been to hall doors which often have enlarged openings and modern doors. The third floor has undergone the most serious alterations. Original elements are occasionally extant and include: doors (wood frame with lights; wood panel or glass pane; glass pane over wood panel); crown molding; wood base; and painted textured wall plaster.

Terrace/Tea Room

Located to the west of the hotel building, the tea room is built into a slope. The terrace is on the same level as the hotel building and the tea room, with a smaller patio, is located a level below. A pair of stairways lead down from the terrace to the tea room. A ballustraded concrete rail defines the southern edge of the terrace and provides a view of panoramic vistas. The tea room patio below also offers views. The tea room facade is composed of a set of arches which hold double doors. Pilasters separate arched bays and terminate in caps at the ballustrade above. The double doors, when open, allow visual access to views and builds on the inside-outside relationship Southern California's climate allows. The tea room exterior is fairly intact. The Spanish Colonial Revival style stucco exterior is similar to the main hotel building. This building is part of the CRC facility.

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OMB Approval No. 1024-1118

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Lake Norconian Club, Riverside County, CA

Laundry/Garage Building

The Laundry/Garage Building is located on axis to the east of the hotel/club building. The two-story Spanish Colonial Revival style building is clad in stucco on the second story. The first story is faced in painted concrete block. The roof is covered in asphalt shingles. Basically rectangular in plan, the primary garage entrance to the building is at the northwestern corner. This corner of the building is truncated creating a short angled façade that holds the main entrance. This elevation, with its arched windows and door, is also the most decorative area of the building. The sides of the garage opening feature quoins at the corner of the building. This creates a visual focal point. Next to the roll-up garage entrance around the corner is a decorative cast stone medallion. This building has recently been rehabilitated, including a seismic upgrade. During the rehabilitation, the south end of the building was demolished for seismic safety reasons.

Gas Station Island

In front of the angled façade of the Laundry/Garage building is a gas station structure with four massive columns supporting a clay tile roof. The roof has decorative rafters.

Gazebos

There are two, small hip-roofed gazebos on the property. Both have red tile roofs and cement work that is formed to resemble wood. One of the gazebos is on the pathway from the hotel to the lake. Its location provides a sweeping vista of the lake. The other gazebo is in the park near the ponds that feed the lake and provides a spot to sit in the shade of the tall palms ringing the ponds and to hear the water cascading from one pond to another.

Maids Quarters

This building was the original maids' quarters and was designed and built in the late 1920s as part of the resort. This two story Spanish Colonial Revival building has a three story square tower entrance capped by a hipped roof. Walls are clad in stucco and the roof is red clay tile. The building is in disrepair and may be demolished. This building provides an interesting contrast, in socioeconomic terms, between the grand hotel and the more utilitarian facilities for the resort's working staff.

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Power Plant and Smoke Stack

The power plant is located to the northeast of the hotel/club building, anchoring a back-of-house utility area that slopes downhill. A functional structure, the power plant is an imposing element of this portion of the site with its soaring smoke stack visible from many vantage points. Basically rectangular in form, the 1-2 story plant building is clad in stucco with clay tile roof in a Spanish Eclectic style. A gable roofed wing projection at the north end creates architectural interest. Fenestration is functional with a variety of window and door types. Throughout the building's life, small shed additions and other utilitarian accretions were added but the basic form and massing of the building and exterior materials are original. The Plant is on the CRC grounds.

Casino/Pavilion

The Spanish Colonial Revival style casino/pavilion is located on the shores of Lake Norconian, downhill from the hotel/club building. A one-story rectangular entry wing leads to an octagonal pavilion designed to maximize visual access to the lake. A walkway surrounds the pavilion and allows outdoor deck-like seating. The entry wing is clad in stucco and features cast stone decoration. This facade features an incised arch with columns on each side. Stepped down parallel, parapeted corridors flank the entry. The entry wing is capped with a hipped clay tile roof; the pavilion features a peaked roof which radiates down to create a circular cap for this focal section. At the center of the roof is a tower-like cupola with a flag post. This pavilion holds a large ballroom/dining area which features floor to ceiling windows on all sides and a balcony. A number of alterations have occurred including shed additions, replacement of doors and windows with aluminum sliders, construction of new pilings for the balcony and numerous

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interior changes. Most significantly, the south wall was replaced with an extension to create a bar and includes a newer plate glass picture window. The Casino/Pavilion is on the Navy grounds and has sufficient integrity to be a contributor. There have been alterations to the building but the core character defining features still have sufficient integrity that the potential for restoration exists.

Boathouse

Near the casino/pavilion is the boathouse and dock. The Spanish Colonial Revival style building is one-story, rectangular and clad with stucco. The long wing sports a cross gabled clay tile roof; and the short projecting wing has a front gabled roof. The low, long structure primarily provided for boat storage and access to the lake. Wooden boat ramps project from the rear into the lake and storage areas for boating equipment are located here. A concrete walkway and block wall provide access from the casino/pavilion. This structure has undergone great alteration. Aluminum windows and new doors replace originals, as well as a new, more homogeneous, clay tile roof. The boathouse is on the Navy grounds. There have been major alterations to the boathouse but the potential for restoration does exist.

Foot Bridge

Remnants of the original landscape remain on the club grounds in spite of the division of parcels and introduction of new structures and landscaping. Upon close inspection, one can discern features, such as occasional stone curbs, which define the original pathway which traversed downhill from the hotel to the casino/pavilion. One of the most intact areas includes a stone bridge, located in a grove of palm trees, which arches over a small stream that feeds Lake Norconian. Approximately 10 feet wide, the arch was designed to allow boats to cruise under the bridge. Four stone and wood steps lead to the arch on each side of the bridge. The footbridge is on the Navy grounds.

Description of Lake and Overview of Landscaping

Lake Norconian is a man-made 58-acre lake with a dam on the south and three mineral hot springs located at the northeast corner of the lake. The lake and surrounding landscaping are currently in a naturalistic setting with flora and fauna that are natural to the area. The area surrounding the hot springs is cultivated and landscaped with grass and trees which are maintained by the Navy.

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Lake Norconian Club

For National Register Nomination

Section 8

Statement of Significance

The Norconian Club was the vision of the City of Norco's founder, Rex B. Clark. Clark hired accomplished regional architects, Stanley G. Wilson and Dwight Gibbs, to master plan and design the grounds, buildings, and interiors for his resort. The popular Spanish Colonial Revival style was executed in a sophisticated manner taking advantage of the City's Mediterranean climate and hilly terrain. Sited prominently on a hill, the Hotel complex has been a landmark defining Norco since 1930. The buildings' profiles have remained imposing as the complex has provided an economic base for the City from its first incarnation as a luxury resort and hotel and even in its adaptation to institutional use. The Norconian Club and hotel provided the framework which spawned stable businesses and created stable jobs for residents of Norco.

The Norconian Club and Hotel stands out among Riverside County's historic hotels as the only one developed as a country resort. The Mission Inn in Riverside was sited within the downtown of that City while the La Quinta Hotel in La Quinta began as a small cluster of modest bungalows without supporting resort facilities. Clark's Norconian Club and Hotel was master-planned and constructed as a complete resort complex and many original historic features remain. The main hotel building's exterior and opulent interior public spaces retain original character-defining features. Other extant resort buildings include the Tea Room, Power Plant, Garage/Laundry and Casino/Pavilion.

Norco's Early Years

In the 19th century, the area where the Norconian Club and City of Norco are located was known as the La Sierra Rancho. Brothers Bernardo and Tomas Yorba held the land grant and the Yorbas raised cattle on the rancho. Around 1845 the rancho was divided between Bernardo and Tomas' widow, Vicente Sepulveda, with Sepulveda granted the eastern portion. In 1890 most of Sepulveda's property was purchased by Willits J. Hole who subdivided the land and named it La Sierra Heights. Willits also ran an agricultural business under the name Rancho La Sierra.

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Twenty years later, in 1920, Hole sold 5,000 acres to the Citrus Belt Land Company who attempted a citrus operation. The lands and localized climactic conditions proved unsuitable for the production of citrus and the land was sold a year later to Rex B. Clark who created the North Corona Land Company and named the area Norco (for North Corona).

Rex B. Clark, the City of Norco and the Norconian Club and Hotel

Rex B. Clark, born in Detroit, Michigan, is the founding father of the City of Norco. Clark began his career as proprietor of a stationery store in Detroit in the late 19th century. Clark married Grace M. Scripps in 1901. By 1910 the couple had moved to San Diego and Clark began ranching and investment ventures. In 1916 Clark established an office in Los Angeles to practice real estate and ranch development which led to his purchase of the lands in Corona. Clark filed the Norco townsite plat in 1923, completed a street layout, water system, and built the Norco School on Acacia Avenue. He also constructed the Norco Store, a hotel and general store on Old Hamner Avenue which was the first commercial business in the area. Clark established the first Norco Post Office in 1923 and served as Postmaster.

In 1924 while drilling on his ranch, Clark discovered sulphur hot springs. Clark envisioned that the hot springs along with the picturesque vistas made the area opportune for development. Clark envisioned a resort hotel complex for Norco.

Clark hired G. Stanley Wilson, a well-known regional architect with offices in Riverside, the county seat of Riverside County, to design a hotel complex to include a man-made lake, hotel, formal gardens, pavilion, Olympic-sized swimming pool, marina, airport, and stables all sited around the hot springs and taking advantage of the vistas. An 18-hole golf course was designed by golf architect John Duncan Dunn. Wilson subsequently became known for the design of major additions to Riverside's Mission Inn.

The architect for the Lake Norconian Club main hotel building was Dwight Gibbs of Los Angeles. Gibbs was best known for theater and auditorium interiors. His accomplished designs included the Carthay Circle Theater in Los Angeles and the Pasadena Community Playhouse in the 1920s. Later in his career, Gibbs was appointed by the Roosevelt Administration to help in federal theater and auditorium projects throughout the U.S. Additional works included the Eaglet Theater for the Sacramento Civic Repertory Company and Fresno State College Auditorium (1949). Clark teamed architects Wilson and Gibbs to create his vision of the Norconian Club as a regional attraction replete with opulent interiors sited to take advantage of sweeping views of local hills and master-planned grounds. Wilson's mastery of the Spanish

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Colonial Revival style suited the Mediterranean climate and setting on the rolling hills. Gibbs' reputation and his flair to create grand and theatrical interior spaces resulted in masterful public rooms in the Hotel from the entrance lobby to the Dining Hall and the Ballroom.

The resort complex was developed over 638 acres at a cost of more than two million dollars. In excess of 1,000 guests attended the formal opening in February 1929. Clark envisioned the resort as an exclusive club for Southern California's scions of industry and created what was arguably, the grandest resort in Southern California. According to the Norco Administrative Building Historic Structures Report:

"The mineral baths facilities included hot sulphur tubs, electric cabinets, Roman, Turkish, Russian, or sun bath. The pools were designed with full roof skylights and were illuminated at nights by neon lights and were reported to resemble 'liquid moonlight.' Interior medieval style tapestries, murals and stenciled artwork of the key social gathering rooms were designed and executed in a medieval character by the Los Angeles designer Anthony B. Heinsbergen."

Although the Norconian Club created the City of Norco by providing an economic focus, Clark's vision of a club resort was short lived. The Great Depression of the 1930s, the resort's distant location from Los Angeles (over 50 miles), and paving of a road to Palm Springs proved too much for the project which operated at a deficit its first year. Two years after it opened Clark made modifications to facilitate operation and changed its name to the Rex Clark Hotel. The hotel operated intermittently throughout the 1930s but economic conditions of the decade proved too much to overcome. By the end of the decade, Clark divested himself of its operation and the property was sold to the U.S. Navy in 1941 just prior to the U.S.'s involvement in World War II. Conversion to a hospital and rehabilitation center for wounded naval personnel included alteration of guestrooms into operating rooms and support facilities. Luckily, few alterations were made to the major public assembly areas such as the dining hall, gym/ballroom, and lobbies. Additional buildings such as quarters for nurses were constructed. The hospital continued in operation until 1949 when it was closed despite protests of local residents and community officials. However, with the start of the Korean War, the Navy recommissioned the facility as a general care hospital in 1951. In 1957 the Navy again closed the facility.

In 1951 the Navy Ordinance Laboratory began operation as a separate facility in the area south of the hotel building, and east of Lake Norconian and the casino/pavilion and boathouse. Throughout the decades, buildings and laboratories were constructed in this area to support research and development activities.

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In 1962 ownership of the northern portion of the property was transferred to the State of California for a correctional/rehabilitation center. Another series of modifications were made including altering original guest rooms into inmate quarters or staff offices. Some accretions such as sheds were added and some French doors had aluminum sliders cut in for ventilation. The indoor pools were decked over and the north pool converted to a conference room. A new two-story exterior stairway was constructed on the end of the south wing (blocking a large arched gymnasium window) and a number of service areas were remodeled into offices. However, major public assembly areas such as the dining hall, gym/ballroom, and lobbies were relatively unaltered. Since the 1960s the institutional ownership of both parcels has remained the same.

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Verbal Boundary Description: APN 129-200, 004, 005

Please see enclosed scale map of the entire resource, Section 10, Page 2.
The boundary of the nominated property is delineated by four vertices
and are marked by UTM reference points on the original USGS map attached.

Boundary Justification:

The boundary is one of convenience, drawn to encompass the
greatest concentration of historic resources and to exclude
non-contributing newer elements.

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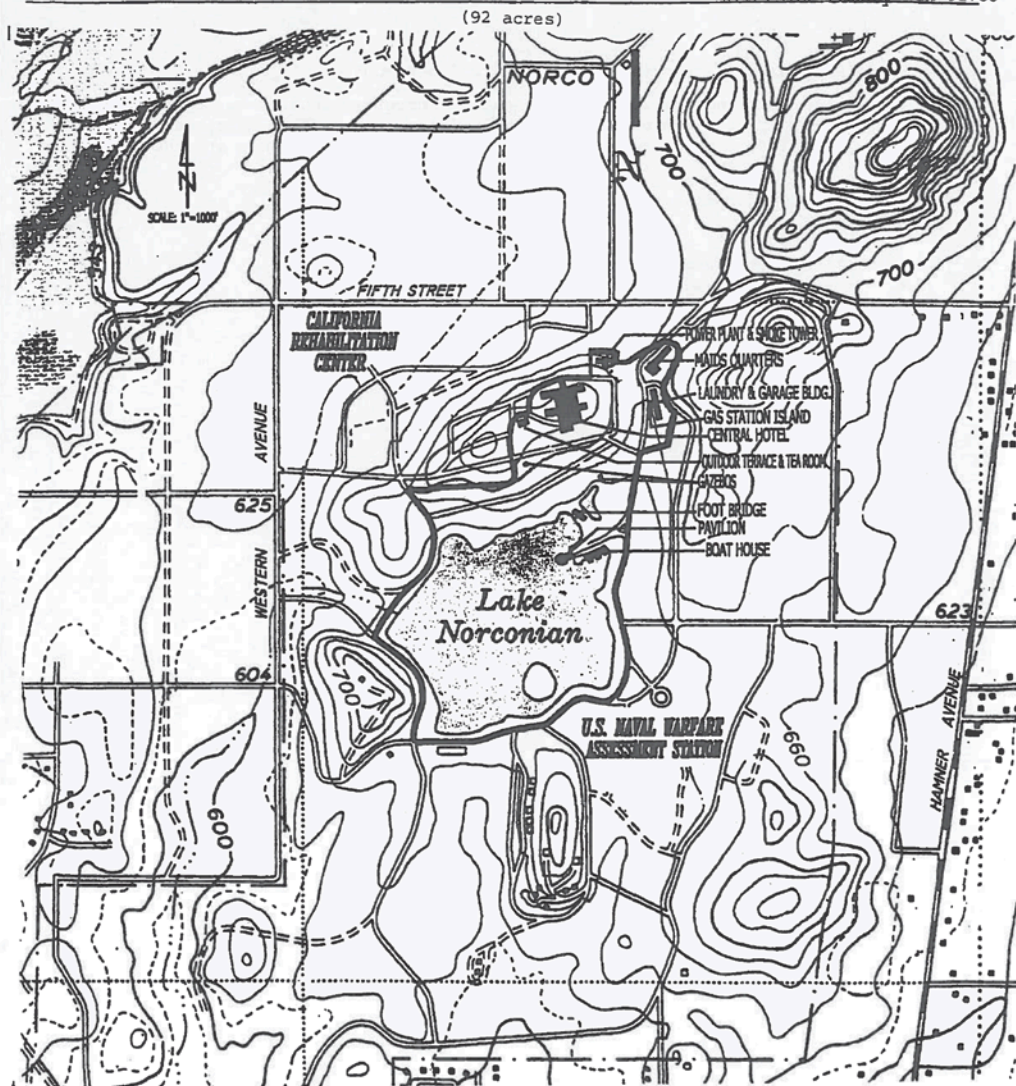
MAP OF THE ENTIRE RESOURCE

Lake Norconian Club

City of Norco

Fifth Street

Riverside County CA 91760



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GEOGRAPHICAL DATA

POINTS
ON
USGS
MAP

HISTORIC RESOURCES, UTM BUILDING LOCATIONS

Recreational Pavilion, Lake Norconian Club
UTM Zone 11 A 447455 E / 3753850

Boat Dock
UTM Zone 11 A 447522 E / 3753859 N

Foot Bridge
UTM Zone 11 A 447501 E / 3753904 N

(2) Laundry and Garage Building
UTM Zone 11 A 447668 E / 3754185 N

(3) Southeast Terminus of Lake Norconian
(Near Flag Pole Circle)
UTM Zone 11 A 447660 E / 3753520 N

(4) Southwestern Terminus of Lake Norconian
(Near Hill B)
UTM Zone 11 A 447168 E / 3753413 N

Power Plant and Smoke Stack
(Northerly point of Historical District)
UTM Zone 11 N 447567 E/3754293

Hotel
UTM Zone 11 N 447428 E/3754231

(1) Tea Room and Terrace
UTM Zone 11 N 447375 E/3754213

/pe 9935

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Excavating for the Dining rooms
MAR 1st 1928



- | | |
|---|---|
| 1. Lake Norconian Club, Fifth St., Norco | 6. Excavation south side of hotel View looking north |
| 2. Riverside, California | 7. Computer scan photo sheet 1 |
| 3. Mott Studio | Sketch Map Hotel #2 |
| 4. 1928 | |
| 5. Norco City Hall | |

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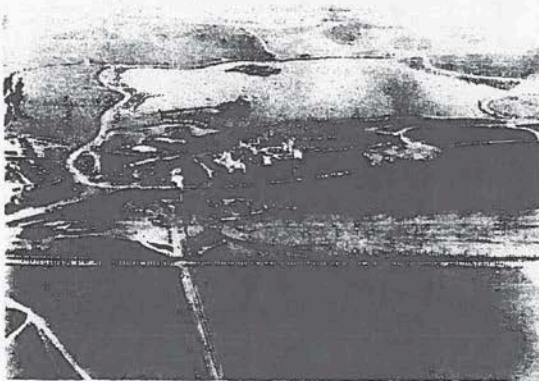
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Air. Aerial View of the Lake Norconian Club - Looking South

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Aerial of Norconian Club District, view looking south
7. Map of entire resource, Section 10, Page 2, Item 1-7

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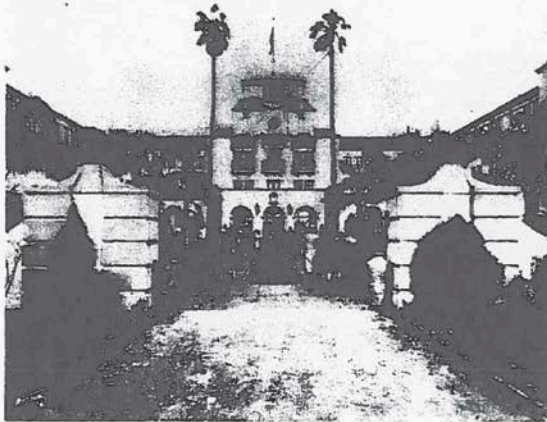
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- | | |
|---|---|
| 1. Lake Norconian Club, Fifth St., Norco | 6. West exterior entrance of hotel View looking east |
| 2. Riverside, California | 7. Computer scan photo sheet 2 |
| 3. Mott Studio | Sketch Map Hotel #2 |
| 4. 1928 | |
| 5. Norco City Hall | |

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The Southwest Side of the Main Club Building from the Rosefield Gardens

- | | |
|---|--|
| 1. Lake Norconian Club, Fifth St., Norco | 6. Southwest exterior of hotel View looking northeast |
| 2. Riverside, California | 7. Computer scan photo sheet 3 |
| 3. Mott Studio | Sketch Map Hotel #2 |
| 4. 1928 | |
| 5. Norco City Hall | |

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1. Lake Norconian Club,
Fifth St., Norco
2. Riverside, California
3. Mott Studio
4. 1928
5. Norco City Hall

6. West exterior entrance of hotel
View looking east
7. Computer scan photo sheet 4
Sketch Map Hotel #2

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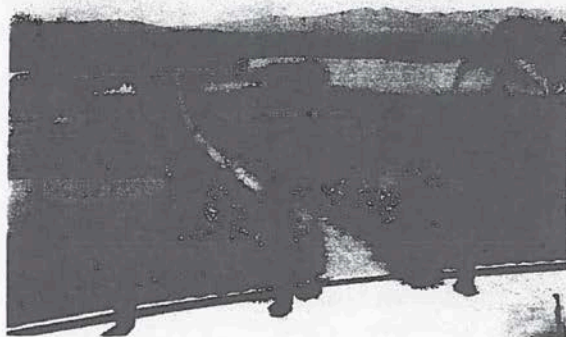
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- | | |
|---|---|
| 1. Lake Norconian Club, Fifth St., Norco | 6. West exterior entrance of hotel View looking east |
| 2. Riverside, California | 7. Computer scan photo sheet 5 |
| 3. Mott Studio | Sketch Map Pavilion #5 |
| 4. 1929 | |
| 5. Norco City Hall | |

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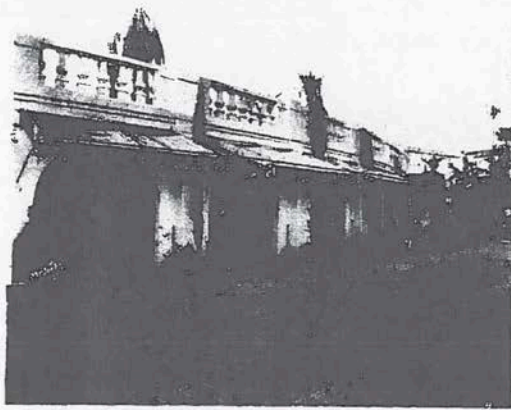
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A Front View of the Lake Norconian Club Tea Room

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Outdoor Terrace and Tea Room, view looking east
7. Map of entire resource, Section 10, Page 2, Item 3

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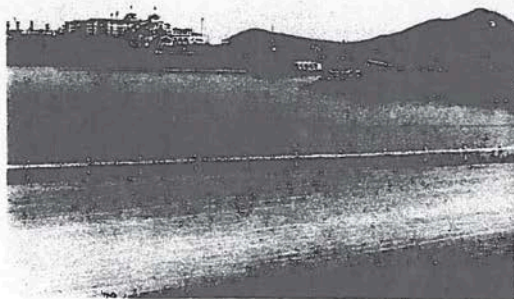
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Looking Across Lake Norconian with the Club Buildings in the Background

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Pavilion and Hotel, view looking north
7. Map of entire resource, Section 10, Page 2, Item 5 and 2

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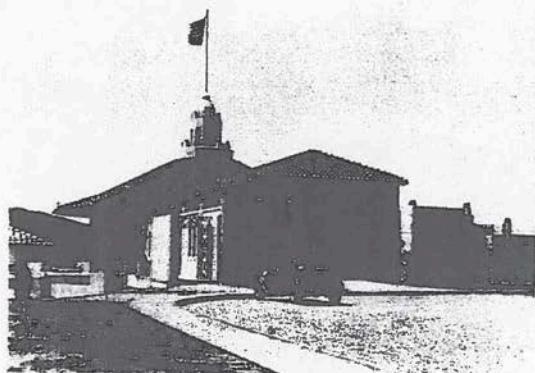
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*The East Side and Entrance of the Lake Norconian Club
"License on the Lake"*

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Pavilion, view looking west at east entrance
7. Map of entire resource, Section 10, Page 2, Item 5

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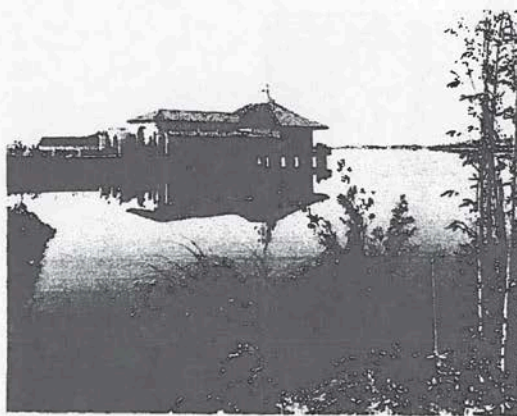
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Lake Norconian Club District Pavilion, view looking south at north exterior

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Pavilion, view looking south at north exterior
7. Map of entire resource, Section 10, Page 2, Item 5

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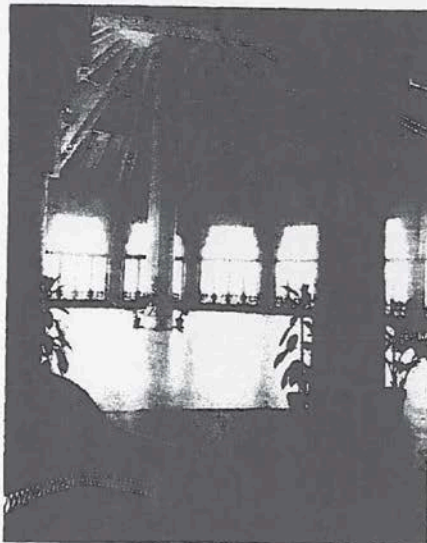
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The Spacious Dance Floor of the Lake Norconian Club's Casino

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Pavilion, view looking west at interior
7. Map of entire resource, Section 10, Page 2, Item 5

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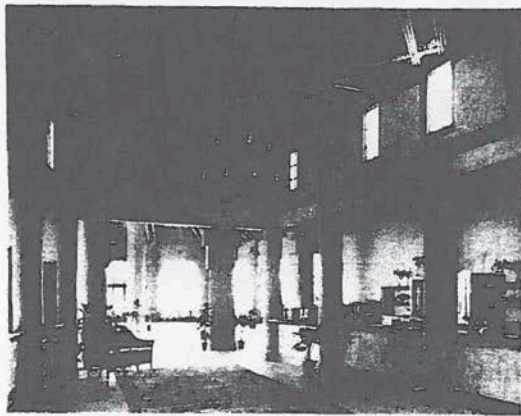
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The interior of the Lake Norconian Club's main room.

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Pavilion, view looking west from east entrance
7. Map of entire resource, Section 10, Page 2, Item 5

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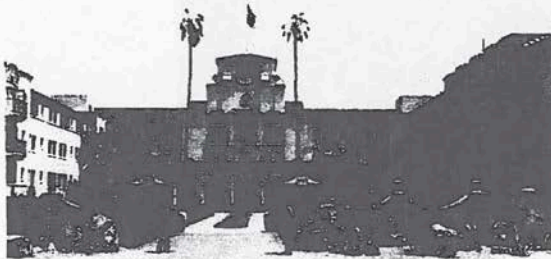
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From Entrance--West of the Main Club Building

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel, view looking east at west entrance
7. Map of entire resource, Section 10, Page 2, Item 2

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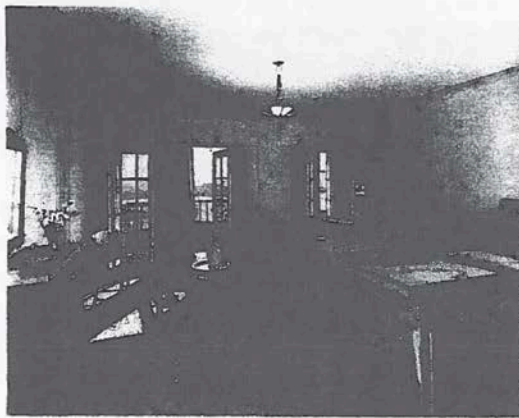
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A Restored Lake Side Guest Room of the Lake Norconian Club

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel, view looking south in south wing
7. Map of entire resource, Section 10, Page 2, Item 2

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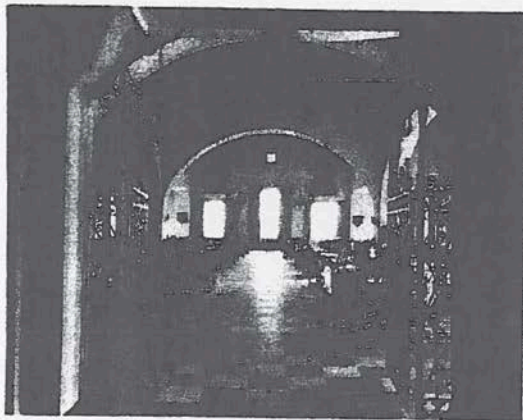
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Main Dining Room of the Lake Norconian Club Looking South

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel, view looking south from north entrance to main dining room
7. Map of entire resource, Section 10, Page 2, Item 2

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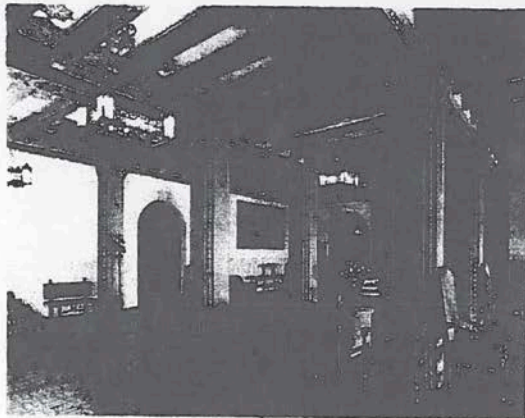
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One Corner of the Beautiful Lobby at the Lake Norconian Club

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel lobby, view looking southeast
7. Map of entire resource, Section 10, Page 2, Item 2

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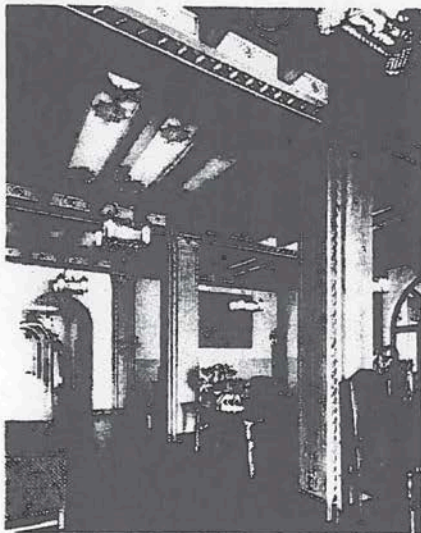
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Main Lobby—Corridor to Northeast, Writing Room, and Swimming Pool

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel, main lobby, view looking east toward writing room and swimming pool
7. Map of entire resource, Section 10, Page 2, Item 2

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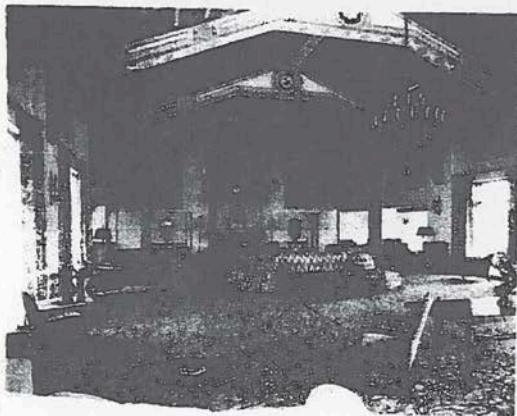
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A very rustic place is the lounge of the Lake Norconian Club

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel lounge
7. Map of entire resource, Section 10, Page 2, Item 2

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The Ball Room of the Lake Norconian Club—Looking North

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel, Ball Room, view looking north
7. Map of entire resource, Section 10, Page 2, Item 2

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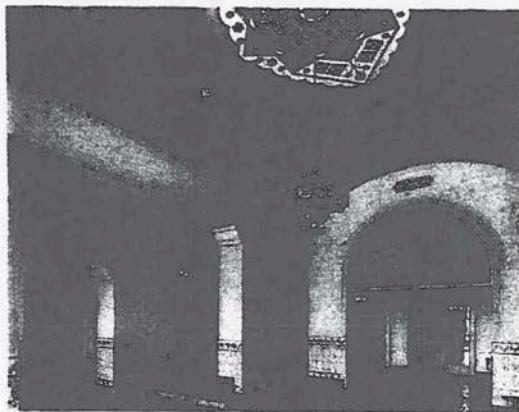
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The Ball Room of the Lake Norconian Club

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 91760
2. Riverside County, California
3. Mott Studio
4. 1929
5. City of Norco Historical Society/City Hall
6. Lake Norconian Club District Hotel, view looking north in lobby outside ball room of Anthony B. Heisenberger mural which depicts a scene from a Renaissance Masquerade.
7. Map of entire resource, Section 10, Page 2, Item 2

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Photo #1

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Original site of pathway from Hotel to Pavilion
7. Map of entire resource, Section 10, Page 2, Item # 3

Photo #2

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Terrace looking east toward Hotel
7. Map of entire resource, Section 10, Page 2, Item # 3

Photo #3

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Southern exterior of Tea Room
7. Map of entire resource, Section 10, Page 2, Item # 3

Photo #4

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Western exterior of Hotel
7. Map of entire resource, Section 10, Page 2, Item # 2

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Photo #5

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Power Plant and Smoke Tower (view looking south)
7. Map of entire resource, Section 10, Page 2, Item # 1

Photo #6

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Pavilion and Boat House (view looking northwest)
7. Map of entire resource, Section 10, Page 2, Item # 5 & 6

Photo #7

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Mott Studio
4. 1929
5. Norco City Hall/Norco Historical Society
6. Southern exterior of Hotel and Pavilion,
Lake and Boat House on right and Hotel on left (view looking northeast
from southern end of Lake Norconian)
7. Map of entire resource, Section 10, Page 2, Lake Norconian

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Photo #8

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Stonework Footbridge (view looking north)
7. Map of entire resource, Section 10, Page 2, Item # 4

Photo #9

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Smoke Tower (view looking southeast)
7. Map of entire resource, Section 10, Page 2, Item # 1

Photo #10

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Terrace above Tea Room (view looking east toward Hotel)
7. Map of entire resource, Section 10, Page 2, Item # 3

Photo #11

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Southern wing of main dinning room of Hotel (view looking southeast)
7. Map of entire resource, Section 10, Page 2, Item # 2

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Photo #12

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Plaque on flag pole located at main entrance to Hotel (view looking west)
7. Map of entire resource, Section 10, Page 2, Item # 2

Photo #13

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. South lobby (view facing north) Anthony B. Heisenberger mural depicts a scene from a Renaissance Masquerade. Ceiling is decorative barrel vault.
7. Map of entire resource, Section 10, Page 2, Item # 2

Photo #14

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Ballroom/Gymnasium (view looking southeast) Decorative beams, stenciled artwork. French doors with concentric semi-circle transom
7. Map of entire resource, Section 10, Page 2, Item # 2

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Photo #15

1. Lake Norconian Club, Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Ballroom/Gymnasium (view looking northeast toward stage area) Decorative beams, heavy ceiling joist girders and flanking nave arcades
7. Map of entire resource, Section 10, Page 2, Item # 2

Photo #16

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Pavilion (view looking north with Hotel on ridgeline)
7. Map of entire resource, Section 10, Page 2, Item # 5

Photo #17

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Pavilion (view looking west and eastern entrance)
7. Map of entire resource, Section 10, Page 2, Item # 5

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Photo #18

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Lake Norconian with Pavilion and Hotel seen in distance (view looking east)
7. Map of entire resource, Section 10, Page 2, Item # 5 and 2

Photo #19

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Lake Norconian with Pavilion and Hotel seen in distance (view looking east)
7. Map of entire resource, Section 10, Page 2, Item # 5 and 2

Photo #20

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Lake Norconian with Pavilion and boat house and Hotel seen in distance (view looking north)
7. Map of entire resource, Section 10, Page 2, Item # 5, 6 and 2

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Photo #21

1. Lake Norconian Club, 2300 Fifth Street, Norco CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Pavilion (view looking west and eastern entrance)
7. Map of entire resource, Section 10, Page 2, Item # 5

Photo #22

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Pavilion (view looking south of northern exterior)
7. Map of entire resource, Section 10, Page 2, Item # 5

Photo #23

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Pavilion (view looking west of southern exterior)
7. Map of entire resource, Section 10, Page 2, Item # 5

Photo #24

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Pavilion (interior view looking east of western entrance door)
7. Map of entire resource, Section 10, Page 2, Item # 5

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Photo #25

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Pavilion and Boat House (view looking west)
7. Map of entire resource, Section 10, Page 2, Item # 5 and 6

Photo #26

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Boat House (view looking south)
7. Map of entire resource, Section 10, Page 2, Item # 6

Photo #27

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Boat House (view looking southwest)
7. Map of entire resource, Section 10, Page 2, Item # 6

Photo #28

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Boat House (view looking west)
7. Map of entire resource, Section 10, Page 2, Item # 6

National Park Service

**National Register of Historic Places
Continuation Sheet**

LAKE NORCONIAN CLUB

FIFTH STREET
CITY OF NORCO
RIVERSIDE COUNTY, CALIFORNIA
91760

ADDITIONAL DOCUMENTATION

Section number _____ Page 9 PHOTOGRAPHS

Photo #29

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Boat House (view looking west)
7. Map of entire resource, Section 10, Page 2, Item # 6

Photo #30

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Foot Bridge (view looking north)
7. Map of entire resource, Section 10, Page 2, Item # 4

Photo #31

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Foot Bridge (view looking south)
7. Map of entire resource, Section 10, Page 2, Item # 4

Photo #32

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Power Plant and Smoke Tower (view looking west)
7. Map of entire resource, Section 10, Page 2, Item # 1

National Park Service

**National Register of Historic Places
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LAKE NORCONIAN CLUB

FIFTH STREET
CITY OF NORCO
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91760

ADDITIONAL DOCUMENTATION

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Photo #33

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. View of entire northern site exterior (view looking south)
7. Map of entire resource, Section 10, Page 2, Item # 1 & 2

Photo #34

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Hotel southern exterior taken from foot bridge (view looking north)
7. Map of entire resource, Section 10, Page 2, Item # 2

Photo #35

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Hotel southern exterior (view looking northwest)
7. Map of entire resource, Section 10, Page 2, Item # 2

Photo #36

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Hotel southern exterior (view looking north)
7. Map of entire resource, Section 10, Page 2, Item # 2

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Photo #37

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Laundry and Garage, full southern and partial western exterior
(view looking northeast)
7. Map of entire resource, Section 10, Page 2, Item # 7

Photo #38

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Laundry and Garage, northwest entrance (view looking southeast)
7. Map of entire resource, Section 10, Page 2, Item # 7

Photo #39

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Laundry and Garage, southwest corner (view looking northeast)
7. Map of entire resource, Section 10, Page 2, Item # 7

National Park Service

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Photo #40

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Laundry and Garage, northern exterior (view looking southeast)
7. Map of entire resource, Section 10, Page 2, Item # 7

Photo #41

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. May 1998
5. Norco City Hall
6. Laundry and Garage, western exterior seal (view looking southeast)
7. Map of entire resource, Section 10, Page 2, Item # 7

Photo #42

1. Lake Norconian Club, 2300 Fifth Street, Norco, CA 19760
2. Riverside County, California
3. Pam Ensley
4. September 1998
5. Norco City Hall
6. Laundry and Garage, western exterior seal under construction
(view looking southeast)
7. Map of entire resource, Section 10, Page 2, Item # 7

/pe 13190

Lake Norconian Club
2300 Fifth Street

NPS Form 10-900a

OMB Approval No. 1024-1118

United States Department of the Interior
National Park Service**National Register of Historic Places
Continuation Sheet**Section _____, Page _____ Response to comments from federal agency

The City of Norco, the applicants, provided these responses following the comment letter from the Navy.

"Following are our best answers to the questions posed by Brian Lusher, Navy Historian.

Section 7, page 4, para. 3: *Description of the 'wave form tile base' would be helpful.*

The tile found on the stairway base is decorated with a yellow wave pattern accented with green on a black background (see pictures A & B).

Section 7, page 4, para. 5: *Description of the original light fixtures would be helpful.*

The original six-sided pendant lantern lights are still extant (see picture C). In addition, there are Mediterranean-style sconces still hanging on the hallway walls that are fully functional (see picture D). A more ornate six-sided pendant lantern chandelier hangs at the entry way to the Dining Room (see picture E).

Section 7, page 5, para. 1: *Are the removed tapestries extant? Is their location known?*

There were several tapestries (quantity unknown). One tapestry came into the possession of the Norco Historical Society by donation or other means, and was on display in Norco City Hall for approximately one year, along with other artifacts and photos from the Club. This tapestry is now in storage at the Norco Historical Society and is in excellent condition.

Section 7, page 5, para 2: *Is the 'outstanding artwork' decorative plaster?*

The artwork on the ceiling in the corridor is hand painted onto heavy canvas fabric affixed to plaster. The ledge along the top edges of the wall near the ceiling is of plaster, and is hand painted as well (see picture F). There has been some water damage to the ceiling mural. The base fabric has torn away from the ceiling in one place. The ceiling mural is geometric in design, with gold chains and floral patterns on an azure blue background. The mural above the corridor doorway in the alcove is hand painted onto heavy canvas as well and

NPS Form 10-900a

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depicts a fanciful Italian Renaissance scene. The mural is in excellent condition (see picture G).

Section 7, page 6, para. 1: Is the infill in the arcaded corridor reversible? The panels used to fill in the arcaded area are not permanent, and could be taken out. They are used to create walls for the conference room (north pool) and a classroom (south pool). The pillars stood around the pools from floor to vaulted ceiling (see pictures H & I).

Section 7, page 6a, para. 1: Are the quoins concrete block?
Yes, the quoins are concrete.

Section 7, page 6a, para. 2: What is the condition and/or state of integrity of the Gas Station Island?
The Gas Station Island is in good condition, and is structurally sound. There have not been any changes or modifications to the original structure. (Charles Quinn, NWAS)

Section 7, page 6a, para. 3: What is the condition and/or state of integrity of the Gazebos?
There were originally three gazebos, but one was removed. The other two are structurally sound and retain their original appearance, although one has been re-roofed. (Charles Quinn, NWAS)

Section 7, page 8, para. 1: Are the concrete walkway and block wall to the boathouse original?
The concrete walkways are original. There was once an additional portion to the boathouse that was used to haul out boats. That portion has been removed. (Charles Quinn, NWAS)

| Letter L5 Response | Andy Okoro, City of Norco July 23, 2013 |
|-----------------------------------|---|
| L5-1 | The commenter's general objection to assertions made in the DEIR is noted. Responses to specific objections are provided in Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco, and the Responses to Comments L5-2 through L5-9. |
| L5-2 | Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco. |
| L5-3 | Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco. With the recent approval of SB 105 on September 12, 2013, the closure of CRC is no longer associated with the legislative mandate in SB 1022 that directed CDCR to cease operations at this prison upon completion of construction of the authorized level II infill facilities by no later than December 31, 2016 and has been suspended indefinitely. |
| L5-4 | The comment incorrectly interprets a statement made in the DEIR regarding funding for modifications. The statement in the DEIR that is referred to in this comment was intended to make it clear that there was no funding to modify the existing structures. If the structures were proposed for modification, it could have resulted in a significant, adverse, physical environmental impact. Further, closure of CRC has been suspended indefinitely and is no longer a consequence of the proposed project. Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco for further clarification. |
| L5-5 | The comment reflects the City's opinion regarding the proposed measures to maintain and secure the CRC property upon closure and is noted. No specific comments addressing the environmental analysis were raised; therefore, no further response can be provided. Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco regarding SB 105 and the removal of closure of CRC from the proposed project. |
| L5-6 | The comment includes a suggestion for 24-hour staffed security and reflects the City's opinion of historic operations with regard to historic and potentially historic structures at CRC. At this point, because closure is no longer proposed, post-closure considerations are no longer relevant. Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco regarding SB 105 and the suspension of the closure of CRC as a result of the proposed project. |
| L5-7 | The comment reflects the City's opinion of historic operations with regard to historic and potentially historic structures at CRC and is noted. Additionally, please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco for information regarding the suspension of closure of CRC, as well as fiscal limitations in the maintenance of CDCR facilities and the un-used structures within prison grounds, such as the Norconian Hotel. |
| L5-8 | CDCR did conduct further historic structures evaluations of the CRC property in 2000 during preparation of an Initial Study/Negative Declaration for the Level II Men's Dormitory Replacement Project, and CDCR is currently coordinating with the Department of General Services, Real Estate Services Division on an inventory of prison structures at or exceeding 50 years old. However, this comment has no relevance to the proposed SB 1022 level II infill projects since the approval of SB 105, which suspends closure of CRC indefinitely. Please |

refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco for further clarification.

- L5-9 This comment states that CDCR has a state-mandated responsibility/obligation to maintain/restore historic resources within its control. It is assumed that the obligation/requirement to which the commenter refers is PRC 5024(a), which states that each state agency shall formulate policies to preserve and maintain, when prudent and feasible, all state-owned historical resources under its jurisdiction..." The limits of annual funding for the repair and maintenance of CDCR facilities is the principal factor in what CDCR considers a prudent and feasible expenditure of funds. In contrast to mission critical structures such as inmate housing units, security systems, infrastructure, and medical/mental health treatment facilities, it is not appropriate to expend limited annual funds appropriated for repairs on buildings not in active use for inmate housing and/or programs; the existing annual repair funds must be directed to higher priority repairs, including emergency repairs. Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco for a further description of annual funding for the repair and maintenance of CDCR facilities.

L6

ACTC

AMADOR COUNTY TRANSPORTATION COMMISSION



July 25, 2013

TO: CDCR
Office of Facility Planning
Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

FROM: Michael E. Vasquez, Chairman

SUBJECT: Comments Regarding the Draft Environmental Impact Report, Level II Infill Correctional Facilities Project

The Amador County Transportation Commission (ACTC) is the State designated Regional Transportation Planning Agency (RTPA) serving the Amador Region (Amador County and Cities of Amador City, Ione, Jackson, Plymouth, and Sutter Creek). In its role as RTPA the ACTC appreciates the opportunity to review the "Draft Environmental Impact Report, Level II Infill Correctional Facilities Project - Volume 3" as it pertains to Mule Creek State Prison in Ione, California.

L6-1

The ACTC maintains a contract with Transportation Engineering/Planning consultants Kittelson & Associates, Inc. and has requested that they review and provide comments on behalf of ACTC. A copy of their comment letter is enclosed. The comment letter by Kittelson & Associates requests that the Traffic Impact Study on which the EIR is based be improved and the Draft EIR be amended accordingly. Pending these corrections to the Traffic Impact Study and EIR, or if it is determined that they will have no material affect on the impacts or mitigations measures identified in the Draft EIR, ACTC also offers the following comments:

L6-2

1. The ACTC did not participate in Caltrans District 3's Traffic Concept Report (TCR) for SR 16. ACTC, Amador County, Amador's incorporated cities, and adjacent counties are contesting the TCR and its plans to relinquish SR 16 to Sacramento County. ACTC and the mountain counties/cities do not consider LOS E to be acceptable on SR 16 in Sacramento County (page 3.11-8). ACTC requests that impacts to SR 16 be addressed based upon the LOS standard "D" and not "E" consistent with other rural conventional highways or IRRS highways in the State (page 3.11-15).
2. The Draft EIR finds that the project would exacerbate unacceptable operating conditions at the intersection of SR 88/104/Jackson Valley Road (East). It proposes to mitigate this impact by paying the County's regional transportation fee (locally referred to as the "Regional Traffic Mitigation Fee [RTMF]"). It states this "would include CDCR's fair share contribution toward the installation of a traffic signal...". However, it also states that "Caltrans and Amador County have indicated there are no proposed or planned improvements at this intersection and thus,

L6-3

L6-4

117 VALLEY VIEW WAY, SUTTER CREEK, CA 95685 — PHONE (209) 267-2282 — FAX (209) 267-1930 — info@actc-amador.org

CDCR
July 25, 2013

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payment of the regional transportation fees would not be expected to result in direct improvement of this intersection" (page 3.11-27).

ACTC requests to know what the CDCR/EIR calculates the RTMF or fair share payment would be. ACTC further advises that this intersection is not included in the current RTMF Capital Improvement Program (CIP). Furthermore, the 2004 Regional Transportation Plan (RTP)/County General Plan Circulation Element does not list this intersection as fundable through the RTMF program and contains policies indicating that in such cases the project should pay the RTMF fee plus a fair share contribution toward the identified improvement (policies 1B(11) and 1B(19)). Consequently, ACTC requests that the CDCR/EIR calculate the fair share contribution that should be put forth in addition to payment of RTMF.

L6-4 cont'd

3. While the City of Ione accepts LOS E and F for the intersections of various City streets that are impacted by the project, the ACTC and Caltrans maintain a goal of LOS D on those streets that are regional roads and State highways within the City. ACTC understands that the City of Ione General Plan Circulation Element allows the City Council to apply judgment in application of its LOS standard at the locations being impacted. ACTC also did not find reference to payment of the City's local road traffic mitigation fee in the Draft EIR and ACTC would advise that Regional Traffic Mitigation Fees have been collected and are being provided toward establishment of the Western Ione Roadway Improvement System (WIRIS) which is intended to provide long term resolution to increased downtown traffic congestion. ACTC recommends that the Ione City Council consider whether or not payment of local traffic mitigation fees or other contributions to offset the impact to downtown intersections is necessary to maintain public health and safety at these locations over the long term.

L6-5

4. The Draft EIR proposes that construction related impacts be addressed through a Traffic Management Plan (TMP). The Draft EIR states the TMP will be developed with the City of Ione and Caltrans after the Draft EIR is certified and/or the project is approved. ACTC recommends that Amador County be included in development of the TMP as well.

L6-6

5. ACTC is concerned that the EIR may underestimate traffic increases on SR 88 eastbound caused by prison expansion because of existing and/or planned prison related facilities in the Stockton area. Please add data and analysis concerning increased travel between the Mule Creek State Prison and these facilities and a determination regarding whether or not additional mitigation is necessary.

L6-7

Once again, ACTC appreciates the opportunity to comment on the Draft EIR for the "Draft Environmental Impact Report, Level II Infill Correctional Facilities Project - Volume 3". The ACTC would continue to offer its staff and consultants to assist the CDCR and its consultants as necessary in their response to comments and preparation of the Final EIR. The ACTC would appreciate receiving copies of the Final EIR before it is submitted for certification.

L6-8

Sincerely,



Michael E. Vasquez
Chairman

MEV/nc



KITTELSON & ASSOCIATES, INC.
TRANSPORTATION ENGINEERING / PLANNING
428 J Street, Suite 500, Sacramento, CA 95814 916.266.2190 916.266.2195

MEMORANDUM

Date: July 16, 2013

Project #:
17263

To: ACTC: Charles Field, Neil Peacock
From: KAI: Jim Damkowitch, Franklin Cai
Project: Level II Infill Correctional Facilities
Subject: Review Comments on Transportation Section of Draft EIR

Kittel & Associates, Inc. (KAI) has reviewed the Transportation Section of the draft report for the Level II Infill Correctional Facilities Project dated June, 2013.

Our comments on the draft report are provided below:

1. All the operational LOS analyses performed for this study utilized the HCM 2000 methodology; however HCM 2010 is the latest guideline and was available at the time of this study. Therefore HCM 2010 methodology should be utilized instead or should adequately justify not using the latest available guideline.
2. The minimal acceptable LOS standard for SR 16 going through Sacramento County should be LOS D for areas not within the County's Urban Service Boundary. Caltrans' TCR 20-Year Concept LOS does not constitute a standard or threshold under CEQA. Caltrans' LOS standard for rural and urban areas (already listed in the report) should be used instead of Caltrans' 20-Year Concept LOS. All impact assessments should be re-examined accordingly.
3. The traffic study needs to list all the roadway projects in the study area assumed under the cumulative scenarios.
4. Peak Hour Factors should be set to .92 for all the intersections under the cumulative scenarios rather than using baseline factors as presented.
5. The traffic study needs to state the fair share percentages of cost to mitigate all the significant impacts, even if they are significant and avoidable.
6. The traffic study needs to list the formula(s) used to calculate the fair share percentages.
7. The traffic study needs to present the fair calculations with the actual number of trips used for each of the significant impacts, even if they are significant and avoidable; and it needs to state the period that each fair share calculation is based on (a.m., midday or p.m.).
8. Since visitor hours are stated in the study as starting at 8:00 a.m. and ending at 3:00 p.m., explanation as to why 50% of visitors are assumed to arrive between 7:00 a.m. and 8:00 a.m. Also, the remaining 50% of arrivals are said to arrive between 6:00 a.m. and 7:00 a.m. or

L6-9

L6-10

L6-11

L6-12

L6-13

L6-14

L6-15

L6-16

L6-17

FILENAME: X:\SACRAMENTO PROJECTS\2011 PROJECTS\PI11052 ACTC- ON-CALL MODELING - JED\TIA REVIEWS\MULE CREEK
STATE PRISON\TIS REVIEW KAI COMMENTS2.DOCX

Level II Infill Correctional Facilities
June 14, 2013

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Page 2

evenly throughout the day. Explanation is needed why the traffic study assumes visitors will arrive a full hour before visitation is allowed. Should this assumption be revised in the analysis to reflect that the remaining 50% of arrivals arrive between 8:00 a.m. and 9:00 a.m. or evenly throughout the day?

L6-17 cont'd

9. State the source of the trip generation rates; it's not clear whether they are from empirical data or ITE Trip Generation Manual. If the ITE Trip Generation manual is used as source, the 9th Edition, which is the latest, should be used.

L6-18

10. Provide the exact dates when the traffic counts were performed. Use of older counts should be documented accordingly as appropriate.

L6-19

11. In the tables for Roadway Segment LOS results, such as table 3.11-4, a column should be added stating the minimum acceptable LOS, since such information is available in the intersection LOS result tables.

L6-20

12. For construction related impacts, only one LOS is reported for three intersections and two LOS results reported for one intersection. Which period (a.m., midday or p.m.) are the LOS results associated with? Is the intention to report the worst period? Please clarify.

L6-21

13. For Existing plus Approved Projects Traffic Projections (Pg. 3.11-38 to Pg. 3.11-39), the approved project trips should be added to the existing counts for study intersections not in the Newman Ridge Quarry TIS; Existing +Approved and Pending (E+AP) volumes should not be the result of growing the counts by a certain percentage.

L6-22

14. When comparing E+AP volumes to cumulative traffic forecasts estimated by the ACTC Model, are those unadjusted raw model volumes? If so, those are not valid comparisons. Cumulative raw model volumes need to be adjusted based on NCRHP-255 methods.

L6-23

15. In Table 3.11-17, a cumulative V/C ratio is shaded gray, when it shouldn't be.

L6-24

Should you have any questions, please contact Frank Cai at 916-822-5355 or Jim Damkowitch at 916-822-5354.

L6-25

Kittelson & Associates, Inc.

Sacramento, California

| Letter L6 Response | Amador County Transportation Commission July 25, 2013 |
|--------------------------|---|
| L6-1 | Introductory comments are noted. No specific comments addressing the environmental analysis were raised in this comment. |
| L6-2 | Responses to comments made by Kittelson & Associates, Inc. are included as Responses to Comments L6-9 through L6-25. As shown in these responses, substantial modifications to the analysis of the DEIR are not required. Please refer to Responses to Comments L6-9 through L6-25 for further clarification. |
| L6-3 | <p>The DEIR used LOS E for SR 16 in Sacramento County to reflect Caltrans' standard for this segment of the road. However, Sacramento County designates LOS D as the minimum acceptable LOS for roads outside the urban services boundary. The text of the DEIR on page 3.11-8 of Volume 3 has been modified as follows to reflect LOS D as the minimum acceptable LOS for SR 16 in Sacramento County:</p> <p>▲ <u>LOS E is the minimum acceptable LOS for SR 16 in Sacramento County per Caltrans. However, Sacramento County's minimum acceptable LOS for roads outside its urban services boundary, including SR 16, is LOS D.</u></p> <p>No new impacts would occur as a result of this change to the DEIR because the minimum acceptable LOS of D would not be exceeded along SR 16 (see Tables 3.11-9, 3.11-14, and 3.11-16 in Volume 3 of the Draft EIR). Therefore, no additional analysis or recirculation of the DEIR is required.</p> |
| L6-4 | Please refer to Responses to Comments S1-2, S1-3, L4-17, and L4-18 pertaining to the proposed project's impact at the intersection of SR 104/SR 88/Jackson Valley Road. The project would generate 3.6 percent of the traffic at this intersection. This was computed by dividing the project's p.m. peak hour trips that would use this intersection by the total new p.m. peak hour traffic increase projected at this intersection. The computation is 20 divided by 562 which equals 3.6 percent. The Regional Traffic Mitigation Fee (RTMF) can be computed by multiplying the project weekday trip generation (764 daily trips) by the regional fee of \$388. This would equate to 764 times \$388, which equals \$296,432. In addition, as noted in Response to Comment S1-2, Mitigation Measure 3.11-1 has been revised to clarify that CDCR will negotiate a fair-share contribution with ACTC for improvements to the SR 88/104/Jackson Valley Road (east) intersection. |
| L6-5 | The DEIR evaluated potential impacts on local roadways within lone against both the City of lone and ACTC/Caltrans standards for LOS, where appropriate. With respect to City of lone LOS standards, potentially significant impacts related to City facilities, per the City's LOS standards, were not identified as part of the DEIR. However, with respect to City traffic mitigation fees, CDCR will provide funds, estimated at \$244,640 for payment of appropriate fees derived from the City's current fee program. This fee was derived based on the City of lone traffic fee of \$3,058/dwelling unit (DU). CDCR divided its total daily trips associated with the project (764) by the Institute of Transportation Engineers rate of 9.57 trips per DU to derive an equivalent dwelling unit (EDU) total of 80. 80 EDU was then multiplied by the per-dwelling-unit fee of \$3,058, which equals \$244,640. As noted in Response to Comment S1-2, Mitigation Measure 3.11-1 on page 3.11-27 of Volume 3 of the DEIR has been amended to reflect payment of fees to the City of lone. |

- L6-6 As stated in Mitigation Measure 3.11-4 on page 3.11-37 of Volume 3 of the DEIR, CDCR will consult with applicable transportation agencies, which would include ACTC.
- L6-7 As noted in the DEIR on page 3.11-3 of Volume 3, vehicle trips associated with the transfer of inmates to and from the proposed complex would be minimal. Further, the analysis of inmate transfers in the DEIR accounted for total inmate transfers to the infill site from the rest of the state prison system. Current estimates of potential transfers to and from the infill site to CDCR's Stockton facility would be less than one trip per week. As a result, additional analysis as part of the DEIR is not considered necessary, as any increases in traffic between Stockton and lone as a result of travel between CDCR's Stockton facility and the proposed project would be minimal and indistinguishable from background traffic trips.
- L6-8 CDCR will provide responses to comments made on the DEIR to commenting public agencies no less than 10 days prior to certification of the EIR, consistent with Section 15088(b) of the State CEQA Guidelines, consistent with the request made in this comment.
- L6-9 Introductory comments are noted. No specific comments addressing the environmental analysis were raised in this comment.
- L6-10 HCM 2010 had not been released at the time the traffic study was initiated. However, the differences in the analysis methodologies pertain largely to unsignalized intersections between HCM 2000 and HCM 2010. Based on a review of potential impacts associated with the proposed project, the differences between the two methodologies would result in minor amendments to the analysis and no new impacts. Revision of the DEIR is not considered necessary or required in order to accurately evaluate and mitigate the potential impacts of the proposed project.
- L6-11 Please refer to Response to Comment L6-3.
- L6-12 With respect to the evaluation of development of the infill site at MCSP, the cumulative conditions analysis assumes all projects included in the 2012 RTP Circulation Improvement Program Tier I Improvements (Full Funding Reasonably Assured) will be in place. This list has been included as Appendix A to the FEIR. None of the projects included on the Tier I list affect the study roadway segments or intersections for this study.
- L6-13 The peak hour factor converts an hourly volume to a peak 15-minute flow rate, and is therefore a measure of how concentrated the traffic volume is in time. A lower peak hour factor means a greater concentration of traffic volume. In general, the peak hour factor will increase as traffic volume increases. That is, as more traffic uses a roadway, drivers adjust their travel time within the peak hour to avoid the peak 15 minutes.
- The peak hour factors used in the analysis are based on measured traffic volumes and range from 0.69 to 0.97 at the study intersections. To avoid missing a potential impact, the existing peak hour factors were used for the cumulative conditions analysis. For intersections that have a peak hour factor lower than 0.92, increasing the value to 0.92 would show improved conditions. For intersections that have a peak hour factor greater than 0.92, decreasing the value to 0.92 would show worse conditions. However, as mentioned above, a decrease in the peak hour factor is unlikely with the increase in traffic volume that occurs under cumulative conditions. As a result, no change was made to the peak hour factors used in the analysis.
- L6-14 Please refer to Responses to Comments S1-2, S1-3, L4-17 and L4-18.

- L6-15 As stated in Response to Comment S1-3, the fair share calculation is based on the Caltrans' Traffic Impact Study Guidelines. The document states that this is a preliminary estimate and starting point for the fair share calculation. Like all projects in the region, however, CDCR will pay its fair share based on City of Lone and ACTC mitigation fees. Please refer to Responses to Comments L6-4 and L6-5.
- L6-16 Please refer to Response to Comment L6-15.
- L6-17 Visitor arrival assumptions were based on CDCR's experience operating prisons throughout California. In CDCR's experience, visitation that is not "by appointment only" typically result in visitors arriving early, as visitation is on a first come, first served basis. As a result, visitors tend to arrive early to avoid long waits.
- L6-18 The source of the trip generation rates is the data provided by CDCR regarding employment, visitors, deliveries, and other services. CDCR bases the estimates on observations and trip counts at various CDCR facilities throughout the State. The ITE Trip Generation Manual is a reference guide for use when the trip generation of a proposed project is unknown. Because the trip generation characteristics of the proposed project are expected to be very similar to other existing facilities, the data provided by CDCR is a better estimation of trip generation than the ITE Trip Generation manual could provide.
- L6-19 As stated on page 3.11-8 of Volume 3 of the DEIR, the traffic counts were conducted in January and February 2013. The exact dates of the traffic counts are:

Intersections

1. SR 16 (Jackson Road)/Lone Road – 2/21/2013
2. SR 16/SR 124 – 2/21/2013
3. SR 104/Lone Michigan Bar Road – 2/12/2013
4. SR 104/Irish Hill Road – 2/21/2013
5. SR 104/MCSP Driveway – 1/15/2013
6. SR 104/Castle Oaks Drive – 2/12/2013
7. Preston Ave (SR 104)/E. Plymouth Highway (SR 124) – 2/12/2013
8. Main St/Preston Avenue – 2/12/2013
9. E. Main St/S. Church Street – 2/12/2013
10. E. Main St/S. Lone Street – 2/12/2013
11. SR 104/S. Lone Street/E. Marlette Street – 2/21/2013
12. SR 124/SR 88 – 2/12/2013
13. SR 104/SR 88/Jackson Valley Road – 2/12/2013

Roadway Segments

Daily roadway segment volumes were obtained from the Caltrans Traffic Data Branch's 2011 Annual Average Daily Traffic (AADT) volume database. For locations where data on AADT volumes are not available, daily traffic volumes were calculated based on the peak hour traffic volumes at the nearest intersection and information obtained from the 2011 Peak Hour Volumes Data Report (Caltrans, 2011).

- L6-20 Tables 3.11-4, 3.11-10, 3.11-15, and 3.11-17 of Volume 3 of the DEIR have been amended to include a column that identifies the "Minimum Acceptable LOS," as shown below. This modification of the DEIR does not alter the analysis contained therein and does not necessitate recirculation of the DEIR.

Table 3.11-4 Roadway Segment Levels of Service Results – Existing Conditions

| Roadway | Location | Roadway Type | <u>Minimum Acceptable LOS</u> | Volume ¹ | LOS | Volume-to-Capacity Ratio |
|------------------------------|---|----------------------|-------------------------------|---------------------|-----|--------------------------|
| Michigan Bar Road | North of SR 104 | Collector, Class III | <u>C</u> | 2,200 | B | 0.13 |
| SR 104 | West of Michigan Bar Road | Collector, Class II | <u>D</u> | 2,400 | B | 0.14 |
| SR 104 | East of MCSP Driveway | Collector, Class II | <u>D</u> | 4,300 | C | 0.25 |
| SR 124 (E. Plymouth Highway) | North of SR 104 | Arterial, Class II | <u>D</u> | 4,500 | B | 0.24 |
| S. Ione Street | South of Main Street | Arterial, Class II | <u>E</u> | 6,200 | C | 0.33 |
| S. Church Street | South of Main Street | Arterial, Class II | <u>E</u> | 6,000 | C | 0.32 |
| Preston Road | North of E. Plymouth Highway/Shakeley Lane | Arterial, Class II | <u>E</u> | 7,400 | C | 0.39 |
| Preston Road | South of E. Plymouth Highway/Shakeley Lane | Arterial, Class II | <u>E</u> | 9,300 | C | 0.49 |
| Main Street | Between Preston Avenue and S. Church Street | Arterial, Class II | <u>E</u> | 9,400 | D | 0.50 |
| SR 88 | West of SR 124 | Arterial, Class I | <u>C</u> | 9,400 | C | 0.47 |
| SR 88 | East of SR 104 | Arterial, Class I | <u>C</u> | 8,500 | C | 0.42 |

Notes: Unacceptable operations are highlighted in bold text.

¹ Two-way daily traffic volumes.

Source: Fehr & Peers, 2013

Table 3.11-10 Roadway Segment Level of Service Results – Existing plus Level II Infill Correctional Facility Complex Conditions

| Roadway | Location | Roadway Type | <u>Minimum Acceptable LOS</u> | Existing | | | Existing plus Complex | | |
|------------------------------|---|----------------------|-------------------------------|---------------------|-----|------------------------|-----------------------|-----|------------------------|
| | | | | Volume ¹ | LOS | v/c Ratio ² | Volume ¹ | LOS | v/c Ratio ² |
| Michigan Bar Road | North of SR 104 | Collector, Class III | <u>C</u> | 2,200 | B | 0.13 | 2,376 | B | 0.14 |
| SR 104 | West of Michigan Bar Road | Collector, Class II | <u>D</u> | 2,400 | B | 0.14 | 2,553 | B | 0.15 |
| SR 104 | East of MCSP Driveway | Collector, Class II | <u>D</u> | 4,300 | C | 0.25 | 4,735 | C | 0.28 |
| SR 124 (E. Plymouth Highway) | North of SR 104 | Arterial, Class II | <u>D</u> | 4,500 | B | 0.24 | 4,584 | B | 0.24 |
| S. Ione Street | South of Main Street | Arterial, Class II | <u>E</u> | 6,200 | C | 0.333 | 6,306 | C | 0.33 |
| S. Church Street | South of Main Street | Arterial, Class II | <u>E</u> | 6,000 | C | 0.32 | 6,115 | C | 0.32 |
| Preston Road | North of E. Plymouth Highway/Shakeley Lane | Arterial, Class II | <u>E</u> | 7,400 | C | 0.39 | 7,814 | C | 0.41 |
| Preston Road | South of E. Plymouth Highway/Shakeley Lane | Arterial, Class II | <u>E</u> | 9,300 | C | 0.49 | 9,542 | D | 0.50 |
| Main Street | Between Preston Avenue and S. Church Street | Arterial, Class II | <u>E</u> | 9,400 | D | 0.50 | 9,621 | D | 0.51 |
| SR 88 | West of SR 124 | Arterial, Class I | <u>C</u> | 9,400 | C | 0.47 | 9,515 | C | 0.47 |
| SR 88 | East of SR 104 | Arterial, Class I | <u>C</u> | 8,500 | C | 0.42 | 8,584 | C | 0.42 |

Notes: Unacceptable operations are highlighted in bold text.

¹ Two-way daily traffic volumes² v/c = volume-to-capacity

Source: Fehr & Peers 2013

| Table 3.11-15 Roadway Segment Level of Service Results – Existing plus Approved Projects plus Project Conditions (Complex) | | | | | | | | | |
|---|---|----------------------|--------------------|---------------------------------|----------|------------------------|--|----------|------------------------|
| Roadway | Location | Roadway Type | Minimum Acceptable | Existing plus Approved Projects | | | Existing plus Approved Projects plus Complex | | |
| | | | LOS | Volume ¹ | LOS | v/c Ratio ² | Volume ¹ | LOS | v/c Ratio ² |
| Michigan Bar Road | North of SR 104 | Collector, Class III | <u>C</u> | 2,560 | B | 0.15 | 2,736 | B | 0.16 |
| SR 104 | West of Michigan Bar Road | Collector, Class II | <u>D</u> | 2,870 | B | 0.17 | 3,023 | B | 0.18 |
| SR 104 | East of MCSP Driveway | Collector, Class II | <u>D</u> | 5,520 | C | 0.33 | 5,955 | C | 0.35 |
| SR 124 (E. Plymouth Highway) | North of SR 104 | Arterial, Class II | <u>D</u> | 5,590 | C | 0.30 | 5,674 | C | 0.30 |
| S. Ione Street | South of Main Street | Arterial, Class II | <u>E</u> | 7,710 | C | 0.41 | 7,816 | C | 0.41 |
| S. Church Street | South of Main Street | Arterial, Class II | <u>E</u> | 7,370 | C | 0.39 | 7,485 | C | 0.40 |
| Preston Road | North of E. Plymouth Highway/Shakeley Lane | Arterial, Class II | <u>E</u> | 8,960 | C | 0.47 | 9,374 | D | 0.50 |
| Preston Road | South of E. Plymouth Highway/Shakeley Lane | Arterial, Class II | <u>E</u> | 11,540 | D | 0.61 | 11,782 | D | 0.62 |
| Main Street | Between Preston Avenue and S. Church Street | Arterial, Class II | <u>E</u> | 11,670 | D | 0.62 | 11,891 | D | 0.63 |
| SR 88 | West of SR 124 | Arterial, Class I | <u>C</u> | 10,160 | C | 0.50 | 10,275 | C | 0.51 |
| SR 88 | East of SR 104 | Arterial, Class I | <u>C</u> | 10,520 | D | 0.52 | 10,604 | D | 0.52 |
| Notes: Unacceptable operations are highlighted in bold text. Shaded text indicates a potentially significant impact. ¹ Two-way daily traffic volumes ² v/c = volume-to-capacity Source: Fehr & Peers 2013 | | | | | | | | | |

| Table 3.11-17 Roadway Segment Level of Service Results – Cumulative plus Project Conditions (Complex) | | | | | | | | | |
|--|---|----------------------|------------------------|---------------------|----------|------------------------|-------------------------|----------|------------------------|
| Roadway | Location | Roadway Type | Minimum Acceptable LOS | Cumulative | | | Cumulative plus Complex | | |
| | | | | Volume ¹ | LOS | v/c Ratio ² | Volume ¹ | LOS | v/c Ratio ² |
| Michigan Bar Road | North of SR 104 | Collector, Class III | <u>C</u> | 2,560 | B | 0.15 | 2,736 | B | 0.16 |
| SR 104 | West of Michigan Bar Road | Collector, Class II | <u>D</u> | 2,870 | B | 0.17 | 3,023 | B | 0.18 |
| SR 104 | East of MCSP Driveway | Collector, Class II | <u>D</u> | 5,520 | C | 0.33 | 5,955 | C | 0.35 |
| SR 124 (E. Plymouth Highway) | North of SR 104 | Arterial, Class II | <u>D</u> | 6,430 | C | 0.34 | 6,514 | C | 0.34 |
| S. Ione Street | South of Main Street | Arterial, Class II | <u>F</u> | 9,220 | C | 0.49 | 9,326 | D | 0.49 |
| S. Church Street | South of Main Street | Arterial, Class II | <u>F</u> | 7,480 | C | 0.40 | 7,595 | C | 0.40 |
| Preston Road | North of E. Plymouth Highway/ Shakeley Lane | Arterial, Class II | <u>F</u> | 10,860 | D | 0.57 | 11,274 | D | 0.60 |
| Preston Road | South of E. Plymouth Highway/ Shakeley Lane | Arterial, Class II | <u>F</u> | 10,560 | D | 0.56 | 10,802 | D | 0.57 |
| Main Street | Between Preston Avenue and S. Church Street | Arterial, Class II | <u>F</u> | 13,050 | D | 0.69 | 13,271 | D | 0.70 |
| SR 88 | West of SR 124 | Arterial, Class I | <u>C</u> | 10,160 | C | 0.50 | 10,275 | C | 0.51 |
| SR 88 | East of SR 104 | Arterial, Class I | <u>C</u> | 14,820 | D | 0.73 | 14,904 | D | 0.74 |
| Notes: Unacceptable operations are highlighted in bold text. Shaded text indicates a potentially significant impact. | | | | | | | | | |
| ¹ Two-way daily traffic volumes | | | | | | | | | |
| ² v/c = volume-to-capacity | | | | | | | | | |
| Source: Fehr & Peers 2013 | | | | | | | | | |

L6-21

The following section from page 3.11-34 of Volume 3 of the DEIR has been amended to clarify the peak hours in which the intersections operate at or near capacity. It should be noted that this information was already provided within the text of this passage but has been rearranged to provide the requested clarity.

The traffic impacts during construction would depend on the construction workers' shifts. Construction traffic could result in temporary impacts at the following facilities that currently operate at or near their LOS thresholds. Facilities not listed are not approaching the LOS threshold and are not expected to result in a significant impact:

- ▲ SR 16/SR 24 – threshold = LOS C; operates at LOS B during the (a.m., midday, and p.m. peak hours) — operates at LOS B; threshold = LOS C
- ▲ SR 104/Ione Michigan Bar Road – threshold = LOS C; operates at LOS B during the (a.m. and midday peak hours) — operates at LOS B; threshold = LOS C
- ▲ SR 104/Irish Hill Road – threshold LOS C; operates at LOS B during the (a.m., midday, and p.m. peak hours) — operates at LOS B; threshold = LOS C
- ▲ SR 104/SR 88/Jackson Valley Road – threshold = LOS D; operates at LOS D during the a.m. and midday peak hours and LOS F during the p.m. peak hour (a.m., midday, and p.m. peak hours) — operates at LOS D and LOS F; threshold = LOS D

- L6-22 As stated on pages 3.11-38 and 3.11-39 of Volume 3 of the DEIR, existing plus approved projects traffic volumes were developed based on information in the approved *Newman Ridge Quarry Traffic Impact Study* (Abrams Associates, 2012). Traffic volumes from the Newman Ridge study were used directly where available. Because the Newman Ridge study did not include all of the study intersections included in this analysis, traffic volumes were developed for the additional study intersections using the same methods used in the Newman Ridge study. Approved projects traffic volumes were balanced between intersections and adjusted where necessary to provide more accurate data.
- L6-23 As stated on page 3.11-49 of Volume 3 of the DEIR, the cumulative forecasts were developed using the state-of-the-practice Difference Method procedure. The Difference Method adds the growth in traffic volume between the future year and base year model to the existing traffic counts. The unadjusted raw model volumes were not used for operations analysis.
- L6-24 Table 3.11-17 of Volume 3 of the DEIR has been amended to remove the shading of the 0.73 v/c ratio shown in the final row of data. This modification of the DEIR does not alter the analysis contained therein and does not necessitate recirculation of the DEIR. Table 3.11-17 is now displayed as shown above under Response to Comment L6-20.
- L6-25 Comment noted. No specific comments addressing the environmental analysis were raised in this comment.

July 31, 2013

CDCR
Office of Facility Planning, Construction, and Management
9838 Old Placerville Road, Suite B
Sacramento, California 95827

L7

Subject: Project Review of the Proposed Level II Infill Correctional Facilities Project, APN 0128-070-040, -050, -060, & -070

Dear Sir or Madam:

We are in receipt of the draft Environmental Impact Report for the above referenced project. The project is located at the southwest corner of the intersection of Peabody Road and California Drive in Vacaville. The subject property is located within the Solano Irrigation District Boundary and therefore subject to the Rules and Regulations, assessments, and charges of the District. The project does not have any impact to District facilities. The following are the District's comments:

1. The California Medical Facility/California State Prison, Solano, currently receives its full allocation of 1,200 acre feet per year from the Solano Project; a contract maintained by the Solano County Water Agency. Any additional water will need to be purchased from the City of Vacaville or the Solano Irrigation District.
2. Any modifications required to the existing water conveyance facilities that transfer raw water from the Putah South Canal to the subject property shall be the responsibility of the CDCR.

L7-1

L7-2

L7-3

Thank you for the opportunity to review and comment on this project. If you have any questions, please contact me at (707) 455-4007 or email jhopkins@sidwater.org

Respectfully,

Justin Hopkins, P.E.
Associate Civil Engineer
Solano Irrigation District
810 Vaca Valley Parkway, Suite 201
Vacaville, Ca 95688
Office: 707.455.4007
Fax: 707.452.8557
jhopkins@sidwater.org

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| Letter L7 Response | Justin Hopkins, Solano Irrigation District July 31, 2013 |
|-----------------------------------|--|
| L7-1 | Comment noted. No specific comments addressing the environmental analysis were raised in this comment. |
| L7-2 | According to CDCR data, CMF/SOL demands approximately 812 afy of water. Solano Irrigation District is correct to state that CMF/SOL's annual allocation is 1,200 acre feet of water from the Solano project, and additional water would need to be purchased from the City of Vacaville or the Solano Irrigation District if contracted water quantities are exceeded. |
| L7-3 | The comment that CDCR is responsible for modifications to the existing water conveyance facilities that transfer raw water from the Putah South Canal to new facilities is noted. No specific comments addressing the environmental analysis were raised; therefore, no further response can be provided. |

L8

DENNIS R. YATES
Mayor

GLENN DUNCAN
Mayor Pro Tem



CITY of CHINO

EARL C. ELROD
TOM HAUGHEY
EUNICE M. ULLOA
Council Members

MATTHEW C. BALLANTYNE
City Manager

August 6, 2013

California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

RE: Notice of Availability of a Draft Environmental Impact Report for the
Proposed Level II Infill Correctional Facilities Project, SCH #2012122038

To Whom It May Concern:

Thank you for the opportunity to review and comment on the Notice of Availability of a Draft Environmental Impact Report for the Proposed Level II Infill Correctional Facilities Project.

It is our understanding, based on notification received from the California Department of Corrections and Rehabilitation, that the decision was made to eliminate the California Institution for Men (CIM) as a possible location based on the level of engineering analysis needed to complete the project within the timeframe allowed. We would appreciate being notified of any future changes to this project or any project proposed at CIM.

Thank you again for the opportunity to review and comment on this project. Should you have any questions, please feel free to contact me at (909) 334-3312.

Sincerely,

Brent Arnold
Interim Director of Community Development



13220 Central Avenue, Chino, California 91710
Mailing Address: P.O. Box 667, Chino, California 91708-0667
(909) 334-3250 • (909) 334-3720 Fax
Web Site: www.cityofchino.org

L8-1

**Letter
L8
Response**

Brent Arnold, City of Chino
August 6, 2013

L8-1 As requested in the comment, the City of Chino will be noticed of any future proposed project at CIM consistent with CEQA requirements.



**AMADOR COUNTY
ADMINISTRATIVE AGENCY**

County Administration Center
810 Court Street • Jackson, CA 95642-9
Telephone: (209) 223-6
Facsimile: (209) 257-0
Website: www.co.amador.ca.us

L9

August 8, 2013

Mr. Robert Sleppy
CDCR
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

Subject: Comments Regarding the Draft EIR for the Mule Creek Prison Expansion

Dear Mr. Sleppy:

Thank you for this opportunity to comment on the Draft EIR.

My concerns with the Draft EIR focus on the modification of the wastewater system currently in place. The plan that is identified within the DEIR states that various improvements will be made to the spray field systems currently in place to mitigate impacts from the expansion combined with improvements that are to be made by the City of Ione. Given the fact that both the City of Ione and the Amador Regional Sanitation Authority (ARSA) are contemplating significant upgrades to their individual wastewater systems, it seems that there is an opportunity for CDCR to participate in the creation of a regional wastewater system that would result in a more efficient system.

I would like for CDCR to consider further and ultimately participate in the creation of such a system as mitigation for the impacts created by this proposed project. I would expect that the spray field system could be abandoned altogether if a new system is created, resulting in the reduction of operating costs to the State.

Again, thank you for the opportunity to comment on the Draft EIR.

Sincerely,

Chuck Iley
Amador County Administrative Officer

L9-1

**Letter
L9
Response****Chuck Iley, Amador County Administrative Agency**
August 8, 2013

- L9-1 The suggestion of a regional wastewater system is noted. CDCR considered this concept in the past but it was cost prohibitive when compared to the relatively minor cost of any upgrades to the existing MCSP WWTP. Based on the analysis shown on page 3.12-13 of Volume 3 of the DEIR, there will be sufficient capacity at the MCSP WWTP to serve the project and the existing prison. The only additional costs associated with the project would be the development of one or more new offsite effluent spray fields, which would also be needed under a regional treatment scenario. Further, no environmental impacts would be changed with this scenario. Given this, CDCR has determined it is in the taxpayers' interests to continue operations at the existing MCSP plant.

L10



CITY of NORCO

CITY HALL • 2870 CLARK AVENUE • NORCO CA 92860 • (951) 735-3900 • FAX (951) 270-5622

August 10, 2013

Robert A. Sleppy
Environmental Services/Public Health Liaison
Department of Corrections and Rehabilitation
Facility Planning, Construction and Management
P.O. Box 94283
Sacramento, CA 94283-0001

Re: Level II Infill Correctional Facilities Project, Draft Environmental Impact Report.

Dear Mr. Sleppy,

I would like the following remarks and requests to be part of the public record pertaining to the Level II Infill Correctional Facilities Project.

L10-1

As stated at the last public hearing, there is great concern for the historic resources located on the soon to close CRC site. Not just those Norconian resources "protected" by National Historic Register listing, but, those historic buildings, structures and features associated with the massive U.S. Naval Hospital Corona (1941 – 1957) and significant Naval Cold War laboratories (1951 – present day).

Respectfully, I suspect there has never been an unbiased attempt to evaluate this clearly historic CRC site -

L10-2

- In relation to the overall historical footprint
- Comprised of dozens of buildings over 50 years old
- WWII medical heritage
- Cold War missile technology heritage
- Groundbreaking CRC Civil addict program launched 50 years ago
- Overall design by one of the great Los Angeles architects – Claud Beelman
- Utilizing archival photographs that reveal the buildings, structures and features are virtually unchanged since the day they were constructed in the mid 1940s..

Clearly, the Department of Corrections claim that abandoning the CRC site does not activate CEQA requirements is incorrect. Further, I have a very great fear that CDCR will simply walk away from CRC as they have another state property located on the western most point of Norco and overlooking the Santa Ana River. For years, the state has been asked to care for and clean up this site and all requests have been ignored. The question one must ask - is the fate of that sewage treatment plant indicative of what will happen to the 110-acre CRC compound once the state leaves?

L10-3

CITY COUNCIL

KATHY AZEVEDO
Mayor

BERWIN HANNA
Mayor Pro Tem

KEVIN BASH
Council Member

HERB HIGGINS
Council Member

HARVEY SULLIVAN
Council Member



State owned abandoned
sewage treatment plant.
(2013)

The state claimed on July 23, 2013 that the CRC complex would not be mothballed, however, minimal security would be left behind and the landscaping would be maintained.

In point of fact, the landscaping is not maintained now. To the right is an 80-year-old sego palm planted at the opening of the Norconian Resort in 1929. This valuable state resource is being left to die, along with most of the once beautiful landscaping listed on the National Register of Historic Places.



I am concerned that CDCR, historically, appears to hold the opinion that no activity of any kind on their part invokes any statute of CEQA designed to protect the environment and particularly historic resources.

Some years ago, a concrete barracks was constructed in the middle of CRC, yet despite clear CEQA requirements, there is no evidence that the required inventory, survey and evaluation of the facility's historic resources took place.

L10-3 cont'd

L10-4

In the early 2000s, the former Norconian Clubhouse/Unit I Naval Administration Building/CRC Administration Building – Women’s Housing Unit was abandoned. At that time, this resource was listed on the National Register of Historic Places, as was the surrounding landscaping as a contributing feature (Norconian Historic District). The Department of Corrections subsequently ripped out this “protected” and stunning historic landscaping and covered the area with portable, temporary office modulars.



There is no evidence that efforts have been made to protect and preserve the Norconian once abandoned, nor was there any attempt, per CEQA requirements to evaluate, survey and/or inventory the Naval Hospital historic resources affected when the modular buildings were installed; particularly the large parking lot once known as the *McIntire Parade Grounds*. It should be noted, the flagpole (left – c. 1945) was relocated and preserved partially intact, however, this was at the behest of employees and not CDCR efforts to comply with state and federal preservation law.

L10-4 cont'd

The current CDCR opinion that the act of abandoning the CRC facility does not invoke CEQA responsibility to survey, assess and evaluate historic resources is not without precedent on their part.

When the former Norconian Clubhouse/Unit I Naval Administration Building/CRC Administration Building/Women’s Housing Unit was abandoned, the state deemed the building seismically unsafe and declared it a “Black Building”.

However, the building was not deemed unsafe because of structural issues, rather the determination was based on mixed occupancy and the 24-hour use of the building; which was claimed unique to all other buildings at CRC. It has been suggested, that if evaluated today and uses altered, the Norconian Clubhouse, based on OSA’s data base algorithm, would likely be deemed a lower seismic risk category.

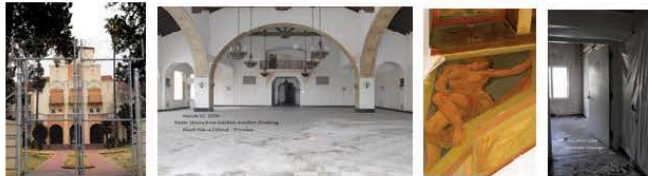
At that time, this action did not mean the Department of Corrections could simply walk away – in fact, there was a very clear expectation that CRC Plant Operations would properly care for the building. It must be noted, to this day, despite CDCR claims to the contrary, CRC employees care for infrastructure systems (electrical, steam, gas and water) located in and under the “dangerous building” that feed other parts of the prison. And, the community, per the requirements of National Register Listing, was allowed limited tours of the magnificent building.

Unfortunately, following the threat of a lawsuit alleging that CDCR was engaging in destruction by neglect with regards to the old Norconian, the building was declared by

L10-5

CDCR as completely unsafe for any entry and tours specifically designed to encourage public support and dollars to properly mothball the building were stopped.

L10-5 cont'd



Because of CDCR neglect, water is killing the magnificent clubhouse

Other untrue claims to bar public entrance and avoid state and federal mandated maintenance included statements that the electrical service was cut, that the building is constructed on sand and not granite, that the Department of General Services as recently as a few weeks ago visited and declared the building unsafe, and that the building must remain locked to prevent high ground advantage to inmates seeking to do damage as if almost the entire complex is not comprised of some very tall buildings. In truth, this last statement points out that CRC is actually a naval hospital completed in 1947 with wire around it and has never been suitable for the incarceration of men and women without exorbitant employee costs.

L10-6

On July 23, 2013, Mr. Sleppy stated that the CRC facilities manager concurred that the building was unsafe to enter. Respectfully, one of the leading Structural Engineers in the nation disagrees and, the current CRC facilities manager does not have the necessary qualifications to conduct a structural analysis of any building, particularly one as complex as the 1928 constructed Norconian. Respectfully, the current CRC facilities manager has been inexplicably hostile to all good faith attempts made by the public to preserve this national treasure, and any opinion expressed by this individual should be viewed in that context.

L10-7

When the former Norconian was declared unsafe to exit in the event of an earthquake, several dozen former Navy buildings constructed on the site prior to 1947 were not claimed to be seismically dangerous. For example, the complex of buildings located on the northwest corner of CRC, the Navy built concrete wing extending from the old Norconian Clubhouse and the Chapel (with rows of fragile stained glass overhead).

L10-8



The “temporary” “Moduloc” buildings house hundreds of prisoners – please note they are constructed on stilts. Also note that archival photos illustrate these buildings are virtually unchanged in almost 75 years.

L10-8 cont'd

Factually, there are thousands of buildings in use throughout California that are in many ways identical to the old Norconian, some clearly less safe; including several located at CRC which currently house prisoners.



There are other preservation issues at CRC. The Navy built chapel is lined with beautiful and historic stained glass that is in danger of crumbling.

Respectfully, good stewardship requires maintenance.

L10-9

Given all of the above, it appears that CDCR does not believe they are responsible to adhere to CEQA requirements, or initiate any historic resource protection efforts whether they go or stay.

Strictly speaking, as an elected official, I simply cannot allow city parks, grounds and buildings to deteriorate – money must be budgeted. However, it appears CDCR has no such obligation and is literally allowing the entire CRC complex, and particularly the Norconian, to deteriorate to a point of no return with the excuse there is no money for upkeep. It is no wonder that the judicial system has stepped in and taken on the task of enforcing CDCR responsibilities.

L10-10



Another issue – it is my understanding that CDCR representatives made the claim that the nearby Youth Authority facility located adjacent to the Chino Prison cannot house adults and never has. This is simply not true.

L10-11

I simply do not understand the authorized expenditure of \$14. hundred million dollars for two far away 1500 cell prisons, forcing the uprooting of correction officers and their families, while a 1200 cell facility sits vacant fifteen minutes away.

L10-12

Below are several requests for documents, which most certainly exist in the system. Unfortunately, repeated requests for these documents have been completely ignored; Hopefully not this time.

L10-13

Finally, I am very aware that in large part the historic resources in existence at CRC survive because of the protections provided by CDCR fences and 24 hours guards. That fact is genuinely appreciated, however, gratitude is tempered by years of neglect to historic structures on the sit, ignoring CEQA law and stonewalling community preservation efforts.

L10-14

My sincerest hope is that from this point forward, a true exit strategy can be developed that benefits all parties concerned.

Respectfully,

Kevin L. Bash

Kevin Bash
Norco City Council

Requests –

1 –

Please provide any and all California Rehabilitation Center Historic Resources Surveys and Studies pertaining to the historic buildings, structures and features associated with the U.S. Naval Hospital Corona (1941 – 1957), Naval Ordnance Laboratories (NOLC, FMSAEG, etc.) (1951 – 1963), and, the earliest era of the prison (1962 – 1963).

2 –

Please provide CEQA required Historic Resources Surveys and Study's pertaining to the building of the most recent inmate barracks and the placement of temporary Administration offices over the Norconian District landscaping area listed on the National Register of Historic Places and the former U.S. Naval Hospital parade grounds/parking lot/McIntire Flagpole circle.

3 –

California Rehabilitation Center Administration Building Relocation Program Plans (modular move in) (2000 – 2003)

4 –

California Rehabilitation Center Seismic Retrofit Program Plans (1995 – 2003)

5 –

Please provide any and all plans for every building located on the CRC site.

C.c. – Senator Richard Roth, Assemblyman Eric Linder, Mayor Kathy Azevedo, LNCF President Jeanne Adams, City of Norco Historic Preservation Chair Su Bacon, Corona Historical Society President Don Williamson

L10-13 cont'd

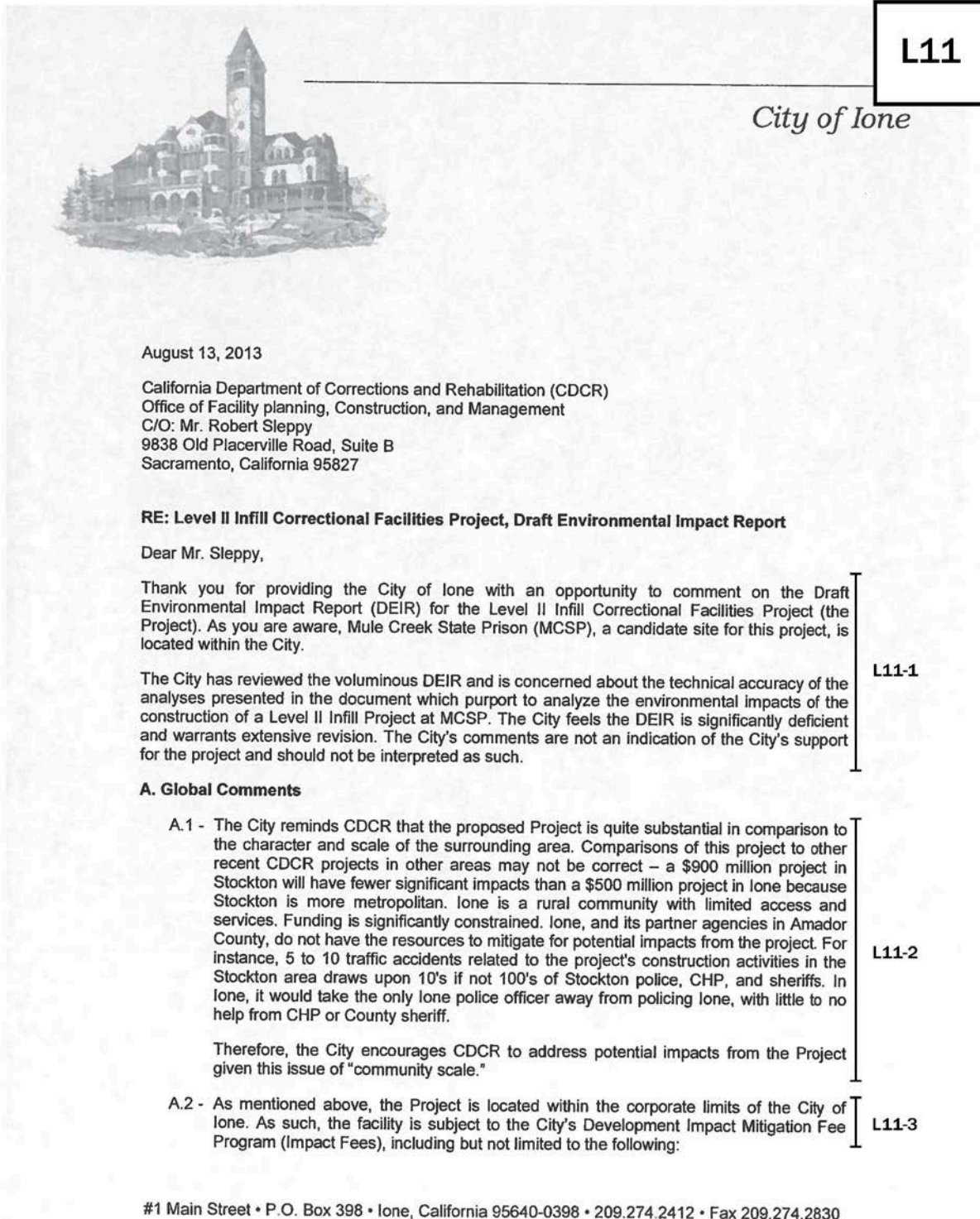
| Letter L10 Response | Kevin Bash, Norco City Council August 10, 2013 |
|------------------------------------|--|
| L10-1 | <p>Comment noted. Responses to comments presented in this letter are provided in Responses to Comments L10-2 through L10-14.</p> |
| L10-2 | <p>The comment reflects the commenter's opinion regarding the level of potentially historic resources present on the CRC property. No specific comments addressing the environmental analysis were raised; therefore, no further response can be provided. Further, even if it can be inferred from the comment that several historic resources should be evaluated, none would have been affected by the closure had it gone forward, and none are proposed for modification now that closure is no longer proposed.</p> |
| L10-3 | <p>Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco for a description of a ministerial action versus a discretionary action under CEQA. As also noted in Master Response 2, the recent approval of SB 105 by Governor Brown suspends closure of CRC indefinitely and removes it from consideration as a consequence of the proposed infill facilities. Finally, there is no connection drawn in the comment between a sewage treatment plant and the proposed Level II Infill Correctional Facilities Project, so further response is not possible.</p> <p>Regarding the assertion that CDCR does not follow CEQA and its environmental protection measures, CDCR respectfully disagrees. By immediate example, CDCR has prepared a full scope EIR evaluating the Level II Infill Correctional Facilities Project. This document acknowledged the closure of CRC, which has now been suspended by more recent legislation (SB 105) providing for this prison to remain operational. Overall, the EIR identified a large number of significant impacts associated with implementation of the proposed project and measures to mitigate those impacts, including measures to protect archaeological resources. However, in the instance of this project, no significant historic resource impacts were identified. CDCR has mitigated historic resource impacts on other projects when the CEQA process determined such environmental effects would occur (e.g., see the New Health Center at San Quentin State Prison EIR, SCH 2007012074 (2007)). CDCR believes it has demonstrated a consistent record of CEQA compliance, as well as implementing environmental protection measures recommended in its CEQA compliance documents.</p> |
| L10-4 | <p>It is assumed that the "concrete barracks" to which the comment refers is the Level II Men's Dormitory Project that was implemented at CRC in 2001. The one contemporary dormitory is typical of the design of modern prison housing. In particular, the use of concrete as a principal building material is necessary to meet state fire code requirements. This project was evaluated as a project under CEQA in June 2000. A negative declaration was prepared and circulated for public review on June 12, 2000, and a notice of determination was filed on August 4, 2000. The potential for this project to impact historic and potentially historic structures was conducted as part of the CEQA process in 2000, and no potentially significant impacts were identified.</p> <p>Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco for a description of why operations at the Norconian ceased. Contrary to the commenter's assertions, CDCR, in conjunction registered structural engineers and seismic retrofit program managers from DSA and Department of General Services, Real Estate Services Division, evaluated the relative level of safety that could be achieved for</p> |

employees, inmates, and visitors to the facility. Consistent with the recommendations of seismic structural studies, the structure of the hotel was deemed unsafe and likely to fail as a result of a major earthquake in Riverside County or adjacent areas. To clarify, CEQA only requires the evaluation of a historic or potentially historic structure when impacts to that structure could be reasonably anticipated through the performance of a discretionary project. SB 1022 contains no funding for the renovation and/or alteration of any structure at CRC; SB 105 also contains no such funding authority.

- L10-5 The comment provides the commenter's understanding of the history of CDCR operations with respect to the potentially historic structures located at the CRC property prior to, during, and after cessation of CDCR activities within those structures. Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco. No specific comments addressing the environmental analysis were raised. Therefore, no further response can be provided.
- L10-6 The comment disputes CDCR's evaluations with regard to the safety of the existing historic and potentially historic structures at the CRC property. However, no evidence is offered by the commenter to support alternate conclusions. CDCR continues to believe that the recommendations of the seismic structural investigations in the late 1990's remain accurate and the building should remain closed to visitation. Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco. No specific comments addressing the environmental analysis were raised. Therefore, no further response can be provided.
- L10-7 The comment reflects the commenter's opinion of the "current CRC facilities manager." No specific comments addressing the environmental analysis were raised. Therefore, no further response can be provided.
- L10-8 The comment provides additional information regarding structures at the CRC property that the commenter believes should be maintained. Please refer to Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco. No specific comments addressing the environmental analysis were raised. Therefore, no further response can be provided.
- L10-9 Contrary to the commenter's assertions, CDCR, as a state agency, adheres to CEQA requirements for any and all discretionary actions. As part of this responsibility, CDCR evaluates the potential impacts to historic structures that may occur as a result of a particular discretionary action. Please refer to Response to Comment L10-3. However, as noted in Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco, the closure of CRC has been suspended indefinitely, as mandated by SB 105. Please refer to Response to Comment L10-5 for a response related to state agency responsibilities related to PRC 5024.
- L10-10 Please refer to Response to Comment L5-9 and Master Response 2, Evaluation of Closure of California Rehabilitation Center, Norco.
- L10-11 Contrary to the commenter's assertions the Stark Youth Correctional Facility was only activated for adult male inmates for a short period following a riot at the adjacent prison. The riot resulted in substantial damage to an inmate housing unit; responding to this riot was an emergency situation that could not have otherwise been anticipated by CDCR. The article to which this comment refers is from the Press Enterprise alludes to the potential use of the Stark Youth Correctional Facility as an adult facility. After this article was published, CDCR determined that permanent housing of adult male inmates within this former juvenile justice facility was not appropriate. As soon as the repairs had been completed the subject inmates

were transferred back to CIM. CDCR does not contemplate routine, non-emergency, use of the Stark Youth Correctional Facility for adult male inmates unless so directed by future legislation.

- L10-12 This comment suggests an alternative (reuse of the former Stark Youth Correctional Facility in Chino, CA) to construction/operation of new level II infill correctional facilities at the proposed infill sites to save costs and jobs. Similar to the evaluation of an alternative involving the reuse of the Preston Youth Correctional Facility on page 5-10 of Volume 1 of the DEIR, reuse of the site of the former Stark Youth Correctional Facility would require demolition and reconstruction of most (if not all) of the onsite structures. Additional high-mast lighting would be necessary, and the existing trees along the edges of Stark would likely have to be removed. This would result in additional lighting impacts to the surrounding residential uses (primarily to the north), as well as existing agricultural operations (livestock) and biological resources impacts. Further, based on initial evaluations of the California Institution for Men (CIM) site, additional traffic impacts would likely occur. Therefore, this alternative is not considered to be a feasible alternative that would avoid or reduce the significant impacts of the project.
- L10-13 The comment requests several documents from CDCR. The comment is noted and will be considered by CDCR with respect to providing previous documents related to CRC. However, no specific comments addressing the environmental analysis were raised and closure of CRC is no longer part of the project.
- L10-14 The comment is noted. No specific comments addressing the environmental analysis were raised; therefore, no further response can be provided.



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- Traffic
- Fire
- Police
- Parks and Recreation
- City Administration
- General Plan Services
- Other impact fees as established by the City Council.

L11-3 cont'd

These Impact Fees are in addition to the Penal Code payment of \$800 per bed that is divided between the local agency and the local school district. References are made in the DEIR to payment of County impact fees. These need to be corrected to reflect City impact fees. The City will work with CDCR to determine the final fee values once the final project design is determined. Note, these fees are in addition to the Regional Traffic Mitigation Fee, which is also applicable to this project.

- A.3 - The DEIR does not describe, with sufficient specificity, various project components that are an integral part of the proposed project. "An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity." (*McQueen v. Board of Directors* (1988) 202 Cal.App.3d 1136, 1143.) For example, the DEIR assumes that various improvements will be constructed, as part of the project, related to stormwater and sewer facilities, but does not describe the nature of those improvements. Moreover, "[a]n EIR should be prepared with a sufficient degree of analysis to provide decision-makers with information which enables them to make a decision which intelligently takes account of environmental consequences." (CEQA Guidelines, §15151; see also *Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 712.) Here, the DEIR improperly defers analysis of environmental impacts under CEQA because of this lack of project specificity and related analyses.

L11-4

- A.4 - The DEIR improperly excludes potentially feasible alternatives. CDCR failed to appropriately analyze the CIM Level II Infill Correctional Facilities Alternative because certain factors would require a longer schedule than could feasibly be accommodated. The issue of feasibility arises at two different points in the alternative analysis, however, first in the assessment of alternatives in the EIR, and second, during the agency's later consideration of whether to approve the project. For inclusion in the EIR, the standard is whether the alternative is potentially feasible. By contrast, at the project approval stage, the decision-maker evaluates whether the alternatives are actually feasible.

L11-5

- A.5 - CEQA does not authorize a lead agency to defer the selection of mitigation to a later date or to rely on other governmental agencies to study and evaluate mitigation measures later. The DEIR improperly defers the selection of mitigation measures in areas such as stormwater and wastewater treatment and relies on the City of Lone to adopt measures that would mitigate the project impacts.

L11-6

- A.6 - The DEIR refers to at least two other projects, an upgrade to the existing MCSP wastewater treatment plant and a project to make substantial improvements to the lone WWTP. These projects are obviously reasonably foreseeable as they are both referenced in the DEIR. These projects should be fully analyzed in a single environmental review document. CDCR has improperly split a project into two or more segments.

L11-7

- A.7 - The City Council feels that impacts on lone's schools are not adequately addressed in the DEIR and would like to see a robust discussion of the prison's impacts to the local school system in the Final EIR. The City Council defers any detailed discussion of local schools to the Unified School District.

L11-8

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B. Section 3.2 – Air Quality

- B.1 - Mitigation Measure 3.1-1b includes watering of construction surfaces multiple times a day. This could be a substantial water demand and should be included in the water supply analysis. What is the source of this water and how will its draw affect the local water supply? L11-9
- B.2 - The project will generate fugitive dust and impact 3.1-1b states that the impact will be significant but "Fugitive dust control measures consistent with ACAPCD Rule 218 are not currently part of the contemplated development at the MCSP Infill Site." Why not? There is no discussion of the feasibility of this mitigation measure. L11-10
- B.3 - Impact 3.1-2-a states that the project would generate 764 daily trips. However, according to the Transportation section, 764 daily trips is the weekday trip generation; the weekend trip generation is 964 daily trips, this is a 26 percent increase over weekday trips. The air quality analysis needs to take into account weekend trips as well. L11-11
- B.4 - Does the air quality modeling take into account the fact that the Population, Employment, and Housing section relies on the fact that most of the employees do not live in the region, so many of the employees are commuting long distances, which would have greater impacts on air quality? Similarly, does the analysis consider that visitors may be driving long distances as well? L11-12
- B.5 - Impact 3.1-5a (and 3.1-5b) does not consider the possible odor impacts that could be generated at the proposed spray field site. L11-13
- B.6 - The air quality analysis fails to correlate the identified adverse air quality impacts to resultant adverse health effects despite the fact that the EIR concludes that the project will result in significant and unavoidable impacts to air quality. L11-14

C. Section 3.4 – Population and Growth Inducing

- C.1 - The analysis (Table 3.4-1) assumes that projected population is the absolute buildout capacity according to the General Plan – 18,182. As stated on page 4.8-8 of the General Plan EIR:

It should be noted that the amount of development expected to actually occur by 2030 will likely be less than the 2030 growth projections used in this EIR. The General Plan capacity, or 2030 capacity, is expressed as the total number of people that would be accommodated within the City's Planning Area if the land within that area were developed to the maximum potential allowed by land use designations in the updated General Plan. The land use designations identified on the updated General Plan Land Use Map have the potential to support a population of 18,182 persons and 7,475 housing units (6,038 single-family units and 1,437 multifamily units) by the year 2030. These housing unit projections are based on the proposed land use designations that allow for residential development and the maximum density permitted within each designation.

L11-15

The analysis in the Project DEIR is based on this population projection. Page 3.4-6 states that the number of employees who could possibly move to lone (1,097, based on the Statewide average of 2.91 persons per household) is only 1.02 percent of lone's projected growth by 2030 (18,182 per the General Plan EIR); therefore, the increase is small and would not stimulate any growth that would trigger housing development. The

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use of this population projection, especially in conjunction with the total project population increase in Amador County of only 3,179 new persons through 2025 is confusing and inappropriate.

The holding capacity under ultimate buildout of the General Plan is not an appropriate number to use in this case. While the City has enough land designated to build enough housing to accommodate a population of 18,182, only a fraction of this development has been entitled and is construction ready. Construction of this Project may create a bubble demand for new housing that could affect the supply of available housing in the community and, given the scale of the Project in relation to the existing resident population of the community, create substantial growth inducing impacts. This potential impact warrants further analysis in the DEIR.

L11-15 cont'd

- C.2 - New employees – The analysis only analyzes the impacts on a few communities, which are the communities that have the greatest number of employees for the current facility. Only Lone and Elk Grove are analyzed by city (see footnote 5 of Table 3.4-1). For the balance of the employees who are in other jurisdictions, which individually have less than 10% of total existing employees, this means that the analysis does not address 72% of employees living in cities other than Lone and Elk Grove. Further documentation of the potential impacts is necessary.

L11-16

- C.3 - Page 3.4-6: Impact 3.4-1a states that it is unlikely that a large number of employees would have to relocate to fill the positions at the new facility due to the County's large labor pool and high unemployment rate. However, it should be noted that a correctional officer is a very specialized job that requires specialized training, so such jobs cannot be filled by just anyone who happens to live in the area. Utilizing an assumption that the positions could be filled by unemployed Amador County residents (who may not have, and may not be able to obtain, the skills necessary to perform the duties of a correctional officer) is a flawed assumption. When CDCR is, ultimately, forced to employ persons who currently live outside of Amador County, a portion of those employees (and their families) will relocate to the Lone area.

L11-17

- C.4 - Lone is a small city, so movement of a smaller number of people to could have a greater effect on the community, including demand for housing services.

- o Assuming that 17% of the new employees at the Project choose to live in Lone (consistent with the percentage of employees at the current facility that live in Lone), that is 33 to 64 new residents. If each new employee has a family, that would add 88 to 171 new residents, based on 2.67 persons per household, to the population of Lone.
- o Impact 3.4-2a and 3.4-2b state that there would not be a substantial demand for housing because 64 homes is not a substantial number of homes. The analysis ignores the fact that Lone is a small city with only 1,630 housing units (2000). Sixty-four homes equates to nearly 4% of the City's total housing stock. While the City's vacancy rate (16.3%) is higher than many communities, it does not consider whether the vacant housing is actually available or habitable. For example, if the housing unit is a second home or vacation home, which is common in Amador County, or if it is in dilapidated condition, it may not be available for occupancy. In addition, the vacant housing units may not meet the needs of the employees who would work at the facility. A quick internet search showed that as of July 24, 2013, only 4 houses in Lone (all prices) are listed for sale and 4 are listed for rent (www.zillow.com).

L11-18

- C.5 - Population numbers in the analysis for Lone include the prison population. The prison population is more than 50% of Lone's population. Therefore, by using the total

L11-19

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population, including inmates, impacts on City population, and therefore services, may not look as severe as they may actually end up being.

- o The 2000 Census shows 3,832 males are part of institutionalized population. 3,297 are part of non-institutionalized population. Total = 7,129. This is consistent with the 2000 population in Table 3.4-1.
- o The 2010 Census shows that institutionalized population in correctional facilities is 4,160. The non-correctional facility population is 3,758. Total population is 7,918 in 2010.

L11-19 cont'd

For example – if 17% of new employees and their families live in lone, by calculating that against the total population (including correctional population), that would be a population increase of 1.2% to 2.3%, based on the city's average household size. Comparing to the non-correctional population, the actual increase of residents (people who would use City services and require housing) would be 2.6% to 4.9%.

- C.6 - The DEIR dismisses these impacts by noting that lone has planned for future growth and that therefore the Project's effect is not significant but the unexpected introduction of the Project into the City's planning area was not considered in the City's planning documents and has the potential to alter and accelerate the rate and nature of growth in the City of lone. Due to the flawed analysis of the Population, Employment, and Housing section, any other portions of the EIR that rely on the assumptions presented in this section are also flawed and do not accurately reflect population-driven impacts on the city, in particular impacts on public services and utilities.

L11-20

D. Section 3.7 – Hydrology (Stormwater)

- D.1 - Impact 3.7-2 states that there is not enough information to fully analyze the potential impacts on the stormwater system, so Mitigation Measure 3.7-2, which requires that final drainage plans be prepared with detailed information, is proposed. However, the mitigation measure does not include any assurances that the City will be involved in that process. Mule Creek, which is the receiving water for stormwater drainage from the Project site, runs through the City. The City is concerned that potential increases in stormwater flows from the Project will impact downstream properties. It is noted that post-Project flows would equal or be less than pre-Project flows. What assurances does the City have that this will be the case? The mitigation measure should be revised to ensure that CDCR involves the City in the process to develop the drainage plan to make sure that downstream properties are not adversely affected.

L11-21

- D.2 - In Impact 3.7-4, the analysis states that the responsibility for disposal of effluent from the facility will be shifted to the City. Specifically, page 3.7-16 states "With implementation of the proposed project, CDCR would continue to store treated effluent onsite and send additional treated effluent to the City of lone WWTP for use on its recycled water irrigation reuse facilities." While the City accepts effluent from CDCR and Amador Regional Sanitation Authority (ARSA), flows are or have been contractually regulated. The City does not have, nor has it planned through its pending facility improvement project to increase, storage and disposal facilities for an increase in effluent transfer. What assurance will CDCR provide the City that it will be compensated for the development of infrastructure necessary or for future storage and treatment of effluent at City facilities?

L11-22

CDCR must mitigate for this impact by funding preparation of a Reclaimed Water Master Plan (including a Finance Plan), with accompanying CEQA analysis, that identifies the infrastructure necessary for disposal of increase effluent from

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CDCR/ARSA. The mitigation measure must also require CDCR to pay for its fair share for infrastructure improvements to implement the plan. L11-22 cont'd

E. Section 3.9 – Noise

- E.1 - Noise measurements were not taken at the nearest non-institutional residences. The existing facility creates noise impacts to near-by residents. This analysis needs to be enhanced. L11-23
- E.2 - If the firing ranges were used during noise monitoring activities, why couldn't noise levels be documented? L11-24
- E.3 - Would use of the firing range increase with the new correctional officers that would staff the proposed facility? If so, this needs to be included in the analysis of operational conditions. L11-25
- E.4 - The use of both Amador County and City of Lone noise performance standards is confusing. The standards of significance use the County standards, but the methodology states that noise levels are compared to City noise standards. The analysis appears to be based on City standards, but this is confusing, so this should be made clearer. Again, the facility is located in the City of Lone, not the unincorporated County. The only local General Plan or Municipal Code requirements/standards that apply to the project are the City's. L11-26
- E.5 - Is the public address system ever used at night, such as under emergency conditions? Could this adversely affect sensitive receptors? L11-27
- E.6 - Page 3.9-24 states that the proposed facility would include approximately 417 parking stalls. Page 3.11-32 in the Transportation analysis states that the facility would have no fewer than 580 parking spaces. This discrepancy needs to be corrected. If there are only 417 parking spaces, this may not meet the parking requirements for the project. L11-28
- E.7 - The analysis does not take into account the noise levels at the existing facility. Would noise levels at the proposed facility be similar? Would noise levels combine with noise from the existing facility to create a cumulative noise impact? How would noise levels at the proposed facility compare the noise levels at the existing facility? L11-29

F. Section 3.10 – Public Services (Police Services)

- F.1 - Due to the flaws in the assumptions made in the Population, Employment, and Housing section regarding the impact that new employees at the proposed facility would have on population and housing stock in Lone, the analyses that rely on this information are flawed as well. L11-30
- F.2 - The EIR fails to properly evaluate and disclose physical environmental effects that would result from the Project's impacts to and depletion of police services. The lack of available public services in a community is a physical environmental effect and must be analyzed and mitigated appropriately. L11-31
- F.3 - Section 3.10.1 indicates that the City of Lone Police Department has 11 volunteer patrol officers but this is incorrect. The Lone Police Department currently has 3 volunteer patrol officers. L11-32
- F.4 - Page 3.10-5 discusses that communities with prisons are not linked to higher instances of crime, but no citation or evidence to support that claim is provided. To make this type of claim, the analysis must provide evidence. (Use a study or compare L11-33

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lone to other similar communities with no prison and compare them similar communities with a prison.) Based upon this lack of information, the City believes that there is a potentially significant impact that must be mitigated. This is based upon the following:

L11-33 cont'd

- o The analysis ignores the impact that would occur from increased employment in the community. The additional employees will necessitate police services for traffic management (e.g., citations), accident control and investigation, and other related service demands.

- o If 17% of employees would live in lone, then the population would increase by 96 to 186 residents, which represents a population increase of 2.5% to nearly 5%. The analysis also does not account for the fact that even relatively small increases in population will have a very dramatic effect on public services.

L11-34

- o The analysis does not address the potential for the possible effects on police services that could result from an increase in non-resident employees and visitors. The traffic analysis assumes that as many as 476 people (Table 3.11-7) per day would visit the prison, which represents approximately 12.7% of the total non-incarcerated population of lone. This increase in the number of people could drastically increase the number of traffic stops, other calls for service that may be related with visitors, and adversely affect traffic conditions, which could require the need for police services.

L11-35

- o New development in lone mitigates for these potential impacts in two ways. First, the payment of property taxes provide base, general fund funding for police services. Second, new development is required, by General Plan policy, to create or annex into a Mello-Roos Community Facilities District (CFD) to fund on-going police operations. Since this is a State facility, there are no based property taxes to collect, making the need for annual special funding all the more important.

L11-36

CDCR must mitigate for these impacts by contributing fair-share funding to the ongoing operations of police services.

L11-37

- F.5 - Project construction would have a severe impact on traffic conditions in lone, which will require the need for police services due to traffic congestion, vehicle code violations, and traffic accidents. The Police Department also anticipates the need to assist in facilitating traffic flow during certain periods of construction activity. While many construction workers may commute to the construction site from other areas, they will increase the number of people who may require police services. This is not addressed in the analysis.

L11-38

Due to the small size of the lone Police Department, the primary mode of operation allows only one officer on duty per 12-hour shift. One officer per shift makes responding to multiple calls impossible. If an incident requiring police services associated with construction or operation of the proposed facility were to occur, the lone Police Department duty officer would not be able to respond to other calls within the City in a timely manner impacting the health and safety of lone's residents.

L11-39

CDCR must mitigate for this impact by providing or funding traffic management support. Examples include, but are not limited to, payment to the City for additional services or contracting with Highway Patrol for services.

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G. Section 3.10 – Public Services (Fire Services)

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|--|--------|
| G.1 - Due to the flaws in the assumptions made in the Population, Employment, and Housing section regarding the impact that new employees at the proposed facility would have on population and housing stock in lone, the analyses that rely on this information are flawed as well. | L11-40 |
| G.2 - The EIR fails to properly evaluate and disclose physical environmental effects that would result from the Project's impacts to and depletion of fire services. The lack of available public services in a community is a physical environmental effect and must be analyzed and mitigated appropriately. | L11-41 |
| G.3 - The analysis ignores the impacts on fire services due to population growth associated with new employees and their families moving to the area. Because the lone Fire Department is small, even relatively small increases in population can have a substantial effect on services. There are only two personnel on duty at a time. The City of lone would experience an approximate 2.6% to 4.9% increase in population if 17% of the new employees moved to lone. This is a substantial increase that is not addressed in the analysis. | L11-42 |
| <ul style="list-style-type: none"> o The analysis also does not address impacts that could result from new employees and their families moving to areas within the lone Fire Department's service area, but outside of the incorporated limits of the City of lone. | L11-43 |
| <ul style="list-style-type: none"> o As with Police services, under the proposed Project there will be an increase in the non-resident employees and visitors to the facility. This increase could drastically increase the number of incidents that would require the need for fire services (e.g., traffic accidents). | L11-44 |
| <ul style="list-style-type: none"> o New development in lone mitigates for these potential impacts in three ways. First, the payment of property taxes provides base, general fund funding for fire services. Second, new development is required, by General Plan policy, to create or annex into a Mello-Roos Community Facilities District (CFD) to fund on-going fire operations. Since this is a State facility, there are no based property taxes to collect, making the need for annual special funding all the more important. Third, there is a County-wide sales tax that funds operations. The City expects that this facility will not generate ongoing sales tax that would otherwise help to support fire operations. | L11-45 |
| CDCR must mitigate for these impacts by contributing fair-share funding to the ongoing operations of fire services. | L11-46 |
| G.4 - The lone Fire Department reports that their call volume increased dramatically during construction of the existing facility due to incidents related to construction activities. It is reasonable that the Fire Department could assume that similar impacts would occur during construction of the proposed facility. Due to the scale of construction, CDCR must address this impact. | L11-47 |
| G.5 - The Fire Department states that they often respond to call associated with the existing facility due to low staffing levels and/or unavailability of the Mule Creek Fire staff. The analysis does not address impacts on the Mule Creek Fire Department at all. Will they be able to accommodate demand for services from the proposed facility? Will they need more staff? If they cannot accommodate demand for services, the lone Fire Department will need to supplement, which would affect their ability to provide service within the City of lone. | L11-48 |

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G.6 - Fire flow is not analyzed at all. The Lone Fire Department has stated that the proposed Project would require a minimum of 2 million gallons of water storage to provide for a possible incident at the proposed facility. How is this issue being addressed? L11-49

G.7 - The proposed Project is located in oak woodlands with hills in the Sierra Foothills, which is a common place for wildfires to occur. However, fire is not disclosed as a possible impact. Further, all of Lone is surrounded by the Medium Fire Hazard Severity Zone (one corner at northeast is Very High). It stands to reason that there is some risk of wildfire. The DEIR needs to be updated to reflect these potential impacts. L11-50

H. Section 3.11 – Transportation

H.1 - The City requests that the community's normal PM peak be added to Tables 3.11-5 through 3.11-8. While it makes sense that traffic analysis looked at a PM peak of 1:30pm to 2:30pm to account for the start of the 2nd Watch, support personnel generally work 8am to 5pm, so their trips are not included in the tables. Also, this does not account for the traffic effects of support staff on other travelers who do commute during regular peak hours. L11-51

H.2 - Page 3.11-4 states, "Because traffic volumes on public roadways are typically lower on weekend than they are on weekdays, the traffic study does not include weekend analysis. Transportation facilities are designed to accommodate peak period demand, which typically occurs on weekdays during commute times. Weekend demand is usually much lower, which means there is additional capacity in the network. The traffic generated by the single facility or complex on a weekend would not result in additional impacts beyond those identified in this analysis."

The facility experiences the most traffic on weekends, because that is when visitors are allowed. Support staff levels are lower, but guard staff remains constant on weekends. With visitors, traffic to the facility on weekends would be approximately 26% greater than on weekdays (58% higher for the single facility). L11-52

Unlike many professions, guards work in shifts and on weekends – The analysis cannot ignore the weekend analysis if most of the new employees work on weekends as well as during Monday through Friday. The proposed Project is occupied and staffed 24/7.

The analysis must fully address weekend traffic impacts because that is when the facility experiences the largest number of trips due to visitors.

H.3 - Page 3.11-3: "The infill facility would generate a negligible number of additional weekday a.m. and p.m. peak-hour trips (i.e., less than five per day). The transfer of inmates would be conducted in accordance with CDCR's existing inmate transfer system, and therefore is not considered a part of the proposed project requiring evaluation under CEQA. Therefore, trip generation estimates for the level II infill correctional facility do not specifically address the trips." L11-53

Why not? What is the rationale for deciding that because transfers are made according to CDCR's existing transfer system means that there will be no impacts on traffic? What is the nexus? How does the fact that there is less than five transfers negate the need to consider these trips in the analysis, especially considering that impacted roadways are already operating at LOS F. Therefore, any new trips could exacerbate conditions. These would be on buses – (assuming) could there be additional impacts from buses? Where are these transfers coming from? What routes are they taking?

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- | | |
|--|-----------------------------|
| <p>H.4 - Page 3.11-7 states, "This planning-level analysis determines whether the study roadway segments are operating below or over capacity. Because this type of analysis is general in nature and does not take into account delays related to intersection operations and other factors affecting capacity, impacts usually defer to a more detailed operational analysis (intersection LOS)."</p> <p>Does this mean that additional traffic analysis will be done later to address the project when it is less "general"? Deferring this analysis is inconsistent with the intent and mandate of CEQA.</p> | <p>L11-54</p> |
| <p>H.5 - Construction traffic impacts are analyzed qualitatively (page 3.11-14). The City has a number of concerns with the depth and breadth of this analysis and the identification of potential impacts to the community.</p> <ul style="list-style-type: none"> o Input from the fire department and police indicates that impacts on their services were substantially affected during construction of the existing facility, and the EIR acknowledges that impacts during construction in many issue areas would be substantial. If this is the case, is a qualitative analysis of construction traffic impacts good enough in predicting possible impacts. Does a quantitative analysis once more detail about construction need to be done before the project can be approved? o The source of construction traffic is not identified in the DEIR. It is reasonable to assume, therefore, that traffic could arrive via SR-88/SR-124 from Stockton or SR-104 from Sacramento. Stockton-sourced routes could result in traffic flowing through the City of Lodi should such traffic utilize the SR-88/SR-124 corridor. The SR-124/SR-104 are sized for local traffic use as they pass through the City, but do not meet Caltrans standards for highways. Larger vehicle used in heavy construction (e.g., grader, transfer dump/semi-trailer end dump, trailer truck), exceed the design standards for these roads. When these heavy trucks enter the City, they cause congestion and place pedestrians and motorists at risk for injury or death. Over the years, heavy vehicles have caused substantive property damage to businesses in Downtown Lodi. Therefore, the City requests that a mitigation measure be added that would require construction equipment and deliveries to be routed around the City (e.g., SR-99 to SR-104) and prohibit construction traffic from the use of State Routes that run through the City (e.g., SR-104 and SR-124 from the south and east). | <p>L11-55</p> <p>L11-56</p> |
| <p>H.6 - Mitigation measures do not provide for compensation to the City (only regional) for impacts on City facilities. Mitigation Measure 3.11-1 should be revised to include compensation to the City for impacts on City facilities. (See discussion on page 1 of this letter.)</p> | <p>L11-57</p> |
| <p>H.7 - The conclusion of Impact 3.11-1 states that implementation of this mitigation measure is infeasible because adding signals is not being planned. Does this mean that they expect that CDCR would not have to pay the traffic impact fee? This should be clarified. While the signalization of the mentioned intersections may not fully mitigate the impacts, payment of the local (City) and regional impact fee, along with other projects, would assist in the development and construction of a longer-term solution.</p> | <p>L11-58</p> |
| <p>H.8 - The parking analysis in Impact 3.11-3 does not address weekend parking demand. With visitors on weekends, weekends will be the time with the greatest parking demand. The analysis relies on the fact that most support staff will not be present on weekends, when visitors would be present. However, there are normally 170 support staff on weekdays (149 during the 8:00-5:00 shift), but on weekends, there would be an estimated 238 visitors. The number of custody employees would remain the same.</p> | <p>L11-59</p> |

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So, there would actually be a net increase of the number of people at the facility on the weekends versus the weekdays, and therefore a greater demand for parking. The analysis should specifically demonstrate that parking capacity would be adequate for all weekend employees, including weekend support employees, and visitors. Also, if, for some reason, more than 15% of inmates have visitors on a particular day, how will the facility deal with that, since parking is not available offsite?

L11-59 cont'd

H.9 - Page 3.9-24 states that the proposed facility would include approximately 417 parking stalls. Page 3.11-32 in the Transportation analysis states that the facility would have no fewer than 580 parking spaces. This discrepancy needs to be corrected. If there are only 417 parking spaces, this may not meet the parking requirements for the project.

L11-60

H.10 - Mitigation Measure 3.11-4 should include a requirement for funding for police and fire services to provide for the increased demand the City anticipates, consistent with the increases in demand experienced during construction of the existing facility.

L11-61

I. Section 3.12 - Utilities (Water Supply)

I.1 - The ratio of prisoners to employees is different under the proposed Project than at the existing facility (4.2:1 / 4.1:1 proposed versus 3.2:1 existing). What is the rationale for this? Should this affect the water demand rates?

L11-62

I.2 - Page 3.12-12 states "CDCR is not required to comply with the requirements of CEQA Guidelines Section 15155." A discussion is necessary to support this conclusion. Further, while the language in Section 15155 identifies the requirement applying to "city and county" lead agency projects, the City believes this language was intended to reflect that the majority of State projects are infrastructure-related (e.g., roads, aqueducts). As a project that will provide housing for more than 1,000 people, the City believes that a Water Supply Assessment is necessary for this project.

L11-63

I.3 - Water supply for fire flow is not considered in the analysis. The Lone Fire Department has stated that the proposed Project would require a minimum of 2 million gallons of water storage to provide for a possible incident at the proposed facility. How is this issue being addressed?

L11-64

I.4 - Impact 3.12-1a (and 3.12-1b) states that because project demand would be less than CDCR's water allocation from AWA, there would be no need for additional water supplies or water treatment facilities. While the analysis demonstrates that there are available water supplies in the allocation, this does not necessarily mean that there is capacity for treatment of the water at the water treatment facility. The analysis needs to disclose existing demands for water treatment and the available capacity for water treatment at the Lone Water Treatment Plant. Page 3.12-5 states that the total capacity of the Lone Water Treatment Plant is 3.3 million gallons per day, but there is no mention of how much water is actually treated at the plant and how much more could be treated within the existing capacity. If there is not available capacity at the Lone Water Treatment Plant, the analysis will need to be revised to consider the environmental impacts that could occur to increase the capacity of the water treatment plant or to construct a new facility that can accommodate project water treatment demands.

L11-65

Further, the Lone Water Treatment Plant backwashes into the City's wastewater system. An increase in use of the AWA facility will likely increase backwash, reducing available capacity in the City's wastewater system. This requires analysis. Additionally, reductions in the City's wastewater system will limit the City's ability to

L11-66

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take on additional effluent flows from the Project, making the need for a Reclaimed Water Master Plan all the more critical.

L11-66 cont'd

J. Section 3.12 – Utilities (Wastewater)

J.1 - The ratio of prisoners to employees is different for proposed than for existing. (4.2:1 / 4.1:1 proposed versus 3.2:1 existing). What is the rationale for this? Should this affect the water and wastewater demand rates?

L11-67

J.2 - Impact 3.12-2a states that with project wastewater flows, the remaining capacity at the onsite wastewater treatment plant (WWTP) would be pushed to the limit and that there is the potential for occasional flow increases due to unusual events (a regional laundry or weather-related) that could exceed capacity. Based on this, the analysis states that the DEIR considers the possibility of modifying the WWTP to accommodate additional flows, and that CDCR will work closely with the Regional Water Quality Control Board (RWQCB) to ensure that the plant is appropriately sized. However, there is no mitigation proposed or assurances that this coordination with RWQCB would actually occur. The analysis cannot make this assumption, so a less-than-significant conclusion is not appropriate.

L11-68

J.3 - The analysis also refers repeatedly to an NPDES permit which is confusing. The City believes the MCSP WWTP operates under Waste Discharge Requirements.

L11-69

J.4 - Impact 3.12-2 also makes the assumption that wastewater treated at the onsite WWTP may need to be sent to the lone WWTP for storage, but that substantial improvements would not be needed at that facility. The analysis does not consider the possible impacts that could occur at the lone WWTP at all. This assumption cannot be made because the analysis does not describe existing conditions at the lone WWTP at all and does not specify how much effluent would be sent to the lone WWTP. There is no way to know whether the lone WWTP has capacity available to accommodate any new flows from the proposed and existing CDCR facilities, so there is no way to conclude that substantial upgrades would not be needed. The analysis needs to specifically address how much effluent will be sent to the lone WWTP, how often, and how the City will accommodate that.

L11-70

J.5 - The analysis under Impact 3.12-2a (and 3.12-2b) also states that CDCR would coordinate with the City of Lone to provide and develop additional spray fields to ensure there is adequate disposal capacity for the proposed and existing facility (since construction of the proposed facility would remove a portion of the spray fields that are used to dispose of effluent from the existing facility). Again, the analysis assumes coordination with the City, but does not propose mitigation or any sort of requirement that this coordination would occur or that the funding necessary to do this would be provided to the City. The analysis cannot make this assumption, so a less-than-significant conclusion is not appropriate.

L11-71

J.6 - Impact 3.12-2a (and 3.12-2b) also states that offsite infrastructure would be needed to convey wastewater flows from the facilities (existing and proposed), and that these impacts are considered in the other section of the environmental analysis. However, the analysis does not identify specific locations of where pipelines that would be needed to convey wastewater flows to the proposed spray fields would be located. Therefore, the analysis cannot assume that the potential impacts associated with construction of these facilities are fully analyzed.

L11-72

CDCR must mitigate for this impact by funding preparation of a Reclaimed Water Master Plan (including a Finance Plan), with accompanying CEQA analysis, that identifies the infrastructure necessary for disposal of increase effluent from

L11-73

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CDCR/ARSA. The mitigation measure must go on to require CDCR to pay for infrastructure improvements to implement the plan.

L11-73 cont'd

- J.7 - Overall, the analysis of the disposal of the wastewater effluent from the proposed and existing facility is based on the assumption that CDCR would use City spray fields that have not yet been developed, but there is no mechanism to guarantee that this happens. The analysis does not consider that the spray fields may not be constructed, or that the City may choose not to allow CDCR to dispose of the effluent at the proposed sprayfield location. Extensive coordination with the City and assurances of financial assistance must occur before this conclusion can be made.

L11-74

Again, CDCR must mitigate for this impact by funding preparation of a Reclaimed Water Master Plan (including a Finance Plan), with accompanying CEQA analysis, that identifies the infrastructure necessary for disposal of increase effluent from CDCR/ARSA. The mitigation measure must go on to require CDCR to pay for infrastructure improvements to implement the plan

L11-75

K. Section 3.13 – Visual Resources

- K.1 - There is no quantification or evidence that lighting levels would be as they are portrayed in the visual simulations. Was there a light study done? The analysis should describe specifically how it was concluded that that is how lighting at the facility would look from the viewpoints.

L11-76

- K.2 - The analysis does address impacts on views from homes on nearby hilltops that may include the proposed facility site in their viewsheds.

L11-77

This concludes the City's comments at this time. The City reserves the right to provide further comment on the Project as it moves forward to ensure it is designed and operated in the best interests of the citizens of Ione. We look forward to discussing the Project with you more.

Sincerely,



Dan Epperson
Mayor, City of Ione

Cc: Ione City Council
Amador County Board of Supervisors

| Letter L11 Response | Dan Epperson, City of Lone August 13, 2013 |
|--|---|
| L11-1 | <p>The comment expresses general concern regarding the technical accuracy of the DEIR. Responses to specific comments pertaining to this general concern are provided below.</p> |
| L11-2 | <p>The comment requests an evaluation of impacts that reflects the issue of “community scale.” CDCR believes it has accurately evaluated the environmental effects of the proposed project on the local and regional environment, including police services. CDCR appreciates that a project in Stockton is different than one in Lone, but the DEIR accurately evaluated potential impacts of the proposed project against applicable thresholds, including local thresholds. The commenter offers no evidence of how the analysis is not appropriate.</p> <p>As it relates to police demand, the CEQA threshold, which focuses on physical environmental impacts, is based on whether the project would cause a demand for more police (or other services) such that new facilities would be needed to house them, and whether the construction of those facilities would result in a significant impact. As described on page 3.10-5, such a result is not reasonably foreseeable with respect to police (or fire) services.</p> <p>However, in response to this comment, CDCR will provide additional resources to the City of Lone during the construction phase, by funding one police officer (including leased equipment) for a period of up to 30 months, including three to six months following substantial activation of the level II infill correctional facilities. CDCR also will fund a firefighter (including equipment purchase) for the same period. As shown in Response to Comment L11-33, which provides a more detailed response to concerns related to public services impacts during construction, CDCR has amended Mitigation Measure 3.11-4 to reflect this commitment.</p> |
| L11-3 | <p>As described in the DEIR on page 3.11-27 of Volume 3, if the proposed complex at MCSP is selected, CDCR will pay into the ACTC regional traffic fee program. CDCR will also negotiate with ACTC to establish a fee for CDCR’s fair share contribution for a traffic signal at the intersection of SR 88/104/Jackson Valley Road (east). The project’s is estimated to generate 3.6 percent of the traffic to this intersection. The payment of these fees would mitigate for and lessen the project’s contribution to significant impacts in the project area. Also as discussed in Response to Comments S1-2 and L6-5, CDCR would provide \$244,640 to the City of Lone in payment of traffic mitigation fees, related to the substantial additional traffic from the project on City of Lone roadways.</p> <p>As described on page 3.10-7 of Volume 3 of the DEIR, with regard to the project’s impacts on schools, local schools have seen declining enrollment and increases in available capacity. Impacts from the project were determined to be less than significant and not require mitigation, including payment of fees. That said, as also acknowledged on page 3.10-7 of Volume 3 of the DEIR, CDCR will pay fees in accordance with AB 900 and California Government Code Section 15819.403 to the local school system, because this is legislatively mandated for the project. The manner in which the local school district chooses to utilize these funds is not tied to mitigating potential impacts of the proposed project.</p> <p>With regard to wastewater, the DEIR describes on page 3.12-14 of Volume 3 that CDCR would coordinate with the City of Lone, including the provision of funding for the development of additional spray fields, and would contribute funding for operation of these new City-operated spray fields. As this coordination and funding for wastewater effluent disposal is a component of the proposed project, identification of payment of fees to mitigate impacts is</p> |

not warranted. No other impacts to City facilities were identified in the DEIR that would warrant the payment of any mitigation fees, and evidence of any other impacts to City facilities was not provided in any comments on the DEIR.

Unlike most development projects in the City, CDCR provides for its own police function and fire-fighting for operation of MCSP facilities, as well as administrative functions. Therefore, it would not result in the same type of demands on City services as residential and commercial development located within the City. CDCR notes, however, that subsequent comments in Letter L11 address concerns by the City that the project may induce growth of development within the City. Notwithstanding individual responses to those comments, if the project induces growth in the City—and the City approves the growth—that growth would be subject to city development fees.

L11-4 The commenter offers the opinion that the Project Description does not provide enough specificity and the DEIR improperly defers analysis of environmental impact. CDCR believes that the Project Description accurately outlines all of the facilities that are necessary to construct the infill project including water and stormwater facilities. See specifically section 2.3.3, Utilities and Service Systems, beginning on page 2-6 of Volume 3 of the DEIR. The commenter does not specify why he believes the project description is deficient and provides no examples or instances where deficiencies occur. Consequently, no further response can be provided. More detailed information on stormwater runoff will be made available from the project's engineering team once there is a full design of the area to be developed for the prison. However, as described in the DEIR, it is not expected that offsite stormwater flows will differ much from existing flows.

L11-5 The comment is mistaken in its assertion that the evaluation of an alternative involving use of existing property at CIM for the development of a level II infill correctional facility was excluded from the DEIR. The evaluation of a facility at CIM was included as an alternative to the proposed project, as shown in page 5-17 of Volume 1 of the DEIR. The evaluation of CIM was performed to the degree of specificity required by CEQA (Section 15126.6 of the State CEQA Guidelines), although it was not performed at an equal-level of detail as the other four contemplated sites.

Further, the DEIR makes several statements that affirm that CIM was not excluded from consideration. For example, as stated on page 2 of the Preface of Volume 1 of the DEIR, "if CDCR were to select CIM for development with a level II infill correctional facility, additional analysis of potential environmental impacts would be required." As shown by the statements in the Preface and elsewhere in the DEIR, CDCR did not exclude CIM as an alternative, contrary to this comment's assertions. It should also be noted that one of the primary requirements for a feasible alternative under CEQA is that it should avoid or substantially lessen significant impacts of the proposed project. Based on the evaluation of alternatives contained in the DEIR, development of level II infill correctional facilities at CIM would likely result in greater impacts than the proposed project.

Finally, as to feasibility, the commenter is correct that alternatives need not be eliminated if they are "potentially" infeasible. However, if an alternative is clearly infeasible, it would not meet the basic CEQA requirement that an EIR evaluate "feasible" alternatives to a project (which are capable of reducing or avoiding its significant effects). In the case of CIM, there simply is not enough time to meet legislatively-imposed deadlines and conduct the studies needed to support a fully CEQA-compliant analysis of CIM, which suggests this alternative is likely infeasible on its face. Regardless, the EIR evaluated two CIM alternatives.

L11-6 The comment makes a general assertion that the selection of mitigation is improperly deferred to a later date. CDCR disagrees. The DEIR includes mitigation that is consistent

with the requirements of CEQA. In some instances, the project is not (and cannot be due to funding restrictions until the EIR is completed) engineered to the point where, for example, the specific location and size of drainage improvements can be provided. In those instances, either performance standards, a menu of various options, or a combination of the two are included and demonstrated to reduce significant effects.

With regard to reliance on the City of Lone's adoption of mitigation, the comment provides no specifics of these instances. CDCR acknowledges that the City of Lone is improving its own WWTP and the City may use additional adjacent agricultural fields for MCSP effluent disposal. CDCR would pay its share of this improvement. With regard to stormwater, impacts were determined to be less than significant during construction and less than significant with mitigation during operation.

The DEIR acknowledges the requirement for the preparation and implementation of a Stormwater Pollution Prevention Plan (SWPPP) that would be prepared as part of the project and in conformance with established regulatory standards and requirements. During operation, implementation of Mitigation Measure 3.7-2 of Volume 3 of the DEIR includes specific performance measures, including adherence to the existing NPDES permit monitoring and reporting program, to ensure that post-project stormwater flows would not result in substantial offsite flows or sediment that may impact the City and other offsite areas. CDCR does not believe that this approach violates CEQA. CDCR provides performance standards and options that assure mitigation will reduce significant impacts in all instances where some uncertainty might otherwise exist, and commits to paying its fair share for mitigation of impacts to which it is one of many contributors (consistent with the principals of nexus and rough proportionality expressed in *Nollan v. California Coastal Commission* (1987) 483 U.S. 825, *Dolan v. City of Tigard*, (1994), *Koontz v. St. Johns River Water Management District* (2013)).

- L11-7 The comment asserts that the upgrade of the existing MCSP WWTP and the City of Lone's planned improvements to the Lone WWTP should have been evaluated as part of the proposed project. CDCR does not agree that they should have been jointly evaluated. These two wastewater improvement projects are separate from the proposed infill project and would proceed independently whether or not the infill project at MCSP was approved. The improvements to the MCSP WWTP were evaluated as a project under CEQA in 2008, and an NOE (State Clearinghouse No. 2008088183) was prepared.

With regard to the City of Lone's planned improvements to the Lone WWTP, CDCR has no discretionary authority over the City's existing plant nor is it within CDCR's purview to require the City to make specific improvements. Currently, CDCR does not intend to have the City's WWTP treat any of the wastewater that would be generated by the proposed project. The proposed project would only increase the area dedicated to effluent disposal. The City is the lead agency for that project, and is responsible for evaluating its impacts and determining which mitigation measures, if any, it should implement. The City is not performing these improvements as a result of the infill project. Therefore, they are separate and independent projects. Consistent with CEQA, CDCR evaluated those facilities both directly and indirectly tied to the project.

- L11-8 The comment is noted. The DEIR included an evaluation of impacts to schools (refer to Impacts 3.10-4a and 3.10-4b in Section 3.10 of Volume 3 of the DEIR.) As stated, enrollment in Amador County schools has declined in recent years and sufficient capacity is available to support school-age children of project employees. A copy of the full DEIR was sent to the Amador County Unified School District at the initiation of the public review period for the DEIR. No comments were received from the school district regarding the analysis provided in the DEIR. Therefore, it is assumed that the analysis is accurate. Further, the

commenter offers no evidence describing how the analysis provided is inadequate. Therefore, no further response can be provided.

- L11-9 The water used to provide dust suppression onsite would be delivered from existing MCSP facilities. Total water demands are not currently known, but would be substantially less than daily operational demands for the infill facility. As a representative example, assuming that up to 4 water trucks, with a capacity of 4,000 gallons, would be required per day to water exposed surfaces, up to 16,000 gallons of water would be required for dust suppression per day. This equates to less than 7 percent of the average daily demand of the proposed level II infill correctional facility complex, which was evaluated on page 3.12-12 of Volume 3 of the DEIR. As described therein, impacts to local water supplies were determined to be less than significant. Per CDCR's agreement with the Amador Water Agency, total water demands would not exceed CDCR's entitlement during construction or operation; therefore there is no evidence to suggest that significant impacts to local water supplies would occur. There is also a potential that CDCR would secure permission from the Central Valley RWQCB for use of treated and disinfected effluent for some, or even a substantial portion, of that needed for dust control and soil compaction.
- L11-10 The comment misconstrues the quoted statement from the DEIR, which referred to pre-mitigation conditions. Dust control measures consistent with ACAPCD Rule 218 are included as Mitigation Measure 3.1-1b on page 3.1-17 of Volume 3 of the DEIR. Following the statement of this mitigation measure, the DEIR discusses the effectiveness of these measures to reduce fugitive dust, consistent with CEQA requirements.
- L11-11 The comment is correct that additional consideration of vehicle trips on the weekend requires amendment of the stated mobile source emissions during operation of a level II infill correctional facility (proposed complex and alternative single). Table 3.1-4 on page 3.1-18 of Volume 3 of the DEIR has been amended as follows:

| Table 3.1-4 Summary of Modeled Daily Emissions of Criteria Air Pollutants and Precursors from Operation of the Level II Infill Correctional Facility Complex | | | | |
|--|---------------------|---------------------|--------------------|-------------------|
| | Emissions (lbs/day) | | | |
| | ROG | NO _x | PM ₁₀ | PM _{2.5} |
| Area Sources | 17.6 | 13.2 | 1.0 | 1.0 |
| Mobile Sources | 7.89.8 | 9.311.7 | 8.911.2 | 0.52.1 |
| Total Unmitigated Emissions | 25.327.4 | 22.624.9 | 9.912.2 | 1.53.1 |
| <i>Threshold of Significance (lbs/day)</i> | 65 | 65 | AAQS | AAQS |
| Notes: AAQS = Ambient Air Quality Standard (California ambient air quality standards are listed in the Table of Standards in Section 70200 of Title 17 of the California Code of Regulations); lbs/day = pounds per day; NO _x = oxides of nitrogen; PM _{2.5} = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM ₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; ROG = reactive organic gases Numbers may not sum exactly to totals due to rounding. Refer to Appendix 3A in this volume for detailed assumptions and modeling output files. Source: Data modeled by Ascent Environmental in 2013. | | | | |

In addition, Table 3.1-6 on page 3.1-24 of Volume 3 of the DEIR has been amended as follows:

| Table 3.1-6 Summary of Modeled Daily Emissions of Criteria Air Pollutants and Precursors from Operation of the Single, Level II Infill Correctional Facility | | | | |
|---|--------------------------------------|---------------------|-------------------|-------------------|
| | Emissions – pounds per day (lbs/day) | | | |
| | ROG | NO _x | PM ₁₀ | PM _{2.5} |
| Area Sources | 7.8 | 5.9 | 0.5 | 0.5 |
| Mobile Sources | 4.06.4 | 4.87.6 | 4.67.2 | 0.31.4 |
| Total Unmitigated Emissions | 11.814.2 | 10.713.5 | 5.17.7 | 0.71.9 |
| <i>Threshold of Significance (lbs/day)</i> | 65 | 65 | AAQS | AAQS |
| Notes: AAQS = Ambient Air Quality Standard; lbs/day = pounds per day; NO _x = oxides of nitrogen; PM _{2.5} = fine particulate matter with an aerodynamic resistance diameter of 2.5 micrometers or less; PM ₁₀ = respirable particulate matter with an aerodynamic diameter of 10 micrometers or less; ROG = reactive organic gases Numbers may not sum exactly to totals due to rounding. Refer to Appendix 3A in this volume for detailed assumptions and modeling output files. Source: Data modeled by Ascent Environmental in 2013. | | | | |

The modification of this text does not change the conclusions of the DEIR. Impacts would remain less than significant. The amended modeling results have been included as Appendix B of the FEIR.

- L11-12 The air quality modeling takes into account standard trip characteristics for Amador County, which is generally a more rural/suburban county and has longer average trip lengths than more urban areas. These assumptions are built into the model (CalEEMod) that was used to evaluate criteria pollutant emissions for the proposed project and are considered acceptable for the purposes of assessing significance under CEQA. It should be noted that this model was developed and approved by ARB, as well as local air districts. Further, not only are emissions below significance standards, they are nearly *80 percent below* significance thresholds (including with corrected emissions levels; refer to Response to Comment L11-11). Even if an argument could be made that the model does not account for longer trips—it does—it would need to be off by a factor of 5 in order to alter the significance conclusions in the DEIR.
- L11-13 Contrary to the assertion made in this comment, the DEIR considers potential odor impacts for the proposed project in its entirety and inclusive of the proposed spray fields as part of Impact 3.1-5a on page 3.1-22 of Volume 3. As noted in the DEIR, the proposed spray fields for the infill project would result in the need for approximately 100 acres of additional offsite spray fields that would be developed and operated under contract with the City. Further, in the City's Wastewater Compliance Project IS/MND, page 3-37, an evaluation of odor impacts associated with the wastewater disposal spray fields was provided and the City concluded that "[n]either construction or operation... should create or cause objectionable odors. Spray fields distribute treated and disinfected effluent that has little to no odor. Because of the relatively remote location of the proposed offsite spray field, and the low potential for odor, odors would not be expected to affect a substantial number of people.
- L11-14 Contrary to the assertion made in this comment, the air quality analysis does provide a detailed discussion of potential health effects associated with each of the pollutants that may occur as a result of implementation of the proposed project. Please refer to pages 3.1-2 through 3.1-27 of Volume 3 of the DEIR for further clarification. Further, the significant and unavoidable air quality impacts identified in Volume 3 of the DEIR are related to potential conflicts with applicable air quality planning efforts and potential violations of air quality standards during construction activities. Impacts 3.1-3a, 3.1-3b, 3.1-4a, and 3.1-4b evaluated potential health effects associated with level II infill correctional facilities (proposed complex and alternative single).

- L11-15 The comment states that the holding capacity under ultimate buildout of the General Plan (18,182 people by 2030) is not an appropriate number to use for the DEIR analysis. The DEIR appropriately relies on the adopted general plans for the study area, including the *City of Lone General Plan Update* and associated EIR, which addresses program-level impacts associated with the anticipated future physical development of the city. The *City of Lone General Plan Update* (adopted August 2009; City of Lone 2009b) projects considerable growth for the City. Similarly, the adopted EIR for the City of Lone General Plan states that the City's population would increase to about 18,182 people by 2030 (see Table 4.3-7 of the *City of Lone General Plan Update DEIR*). The actual rate of City growth, however, will be a function of market demand for new development. The impact of the current economic slowdown and foreclosure crisis on the housing market is dramatic and the related reduction in growth for housing demand could extend that timeframe.

The City is projecting substantial growth in its General Plan (an increase of over 10,000 residents between 2009 and 2030), but the comment expresses concern that some of this growth may occur as part of the project. The DEIR, basing its analysis on the location of where current MCSP employees live, projects a demand for 64 housing units (186 people) in Lone with construction and operation of a complex at MCSP. This is a small component, less than 2 percent of projected growth over 20 years. If the projected growth in the City is spread evenly over 20 years, an estimated 500 people per year would move to Lone. If all CDCR projected population growth were to happen in one year, it would constitute less than 40 percent of that year's growth. The commenter does not offer an alternative housing capacity—different from its own General Plan—to be used in the DEIR analysis.

Further, the commenter offers no evidence to support its opinion that the project could create a bubble demand for new housing. Available information suggests that population growth from the project would be absorbed in the already-expected growth. The project's contribution to this growth is not substantial and the conclusions in the DEIR, that population and employment growth would be within the expectations of local general plans (see page 5-6 of Volume 3 of the DEIR) is accurate.

- L11-16 The comment questions why only the cities of Lone and Elk Grove were analyzed by city in the Population and Housing analysis presented in the DEIR. The DEIR describes how the study area was determined on page 3.4-1 of the DEIR, Volume 3. In summary, the cities of Lone and Elk Grove were selected because they are the cities that contain the highest number of existing MCSP employees, and it is reasonable to assume that new staff related to the proposed project would also predominately reside in these two cities. Additionally, the counties with the highest number of existing employees were also analyzed (Sacramento [including Elk Grove], Amador [including Lone], and San Joaquin counties). Other locations were not considered in the DEIR analysis because the number of MCSP employees who currently reside, and would be expected to reside, in other communities is low and would not have a measurable impact on employment, population, and housing characteristics in these communities.

Footnotes 2 and 5, respectively, of Table 3.4-1 on page 3.4-3 of Volume 3 of the DEIR state:

Less than 16% of MCSP employees reside in 20 other counties, each of which represents less than 7% of total employee population.

Less than 72% of MCSP employees reside in 87 other jurisdictions, each of which represents less than 10% of total employee population.

As noted above, besides the cities of Lone and Elk Grove, existing employees reside in 87 other jurisdictions. It was not prudent or necessary to include analysis of all cities in which existing employees reside, but rather the cities in which most of the existing employees

reside (namely, the cities of Lone and Elk Grove). For informational purposes, the following identifies the percentage distribution of all other communities that pertain to one percent or more (15 or greater) of existing MCSP employees:

- | | |
|---|----------------------------------|
| ▲ Stockton – 6.47 percent of total MCSP employees | ▲ Pioneer - 1.90 percent |
| ▲ Galt – 5.34 percent | ▲ Rancho Cordova - 1.90 percent |
| ▲ Jackson – 4.48 percent | ▲ Plymouth - 1.64 percent |
| ▲ Lodi – 3.79 percent | ▲ Shingle Springs - 1.64 percent |
| ▲ Sutter Creek – 3.79 percent | ▲ Valley Springs - 1.55 percent |
| ▲ Pine Grove - 3.19 percent | ▲ Morada - 1.38 percent |
| ▲ Rancho Murrieta – 2.41 percent | ▲ El Dorado Hills - 1.29 percent |
| ▲ Folsom – 2.07 percent | |

The highest concentration of projected employee residents (based on existing addresses) not included in the DEIR, Stockton, would see an increase of 25 employees. This is not substantial and each of the communities listed above are projected to receive fewer employees. The DEIR cut off its analysis at an appropriate level, a level at which the addition of employees (and their families) to a community could be substantive.

L11-17 CDCR agrees that some positions that would be filled at the infill site would require specialized training. As discussed in Impacts 3.4-1a and 3.4-1b of the DEIR, Volume 3, new employees associated with the proposed project would likely originate from a combination of the following: Amador County's large labor pool (14,620 people in December 2012, with an unemployment rate of 11.1 percent); former staff of the Preston Youth Correctional Facility (PYCF), which was closed in 2010 and employed approximately 400 staff (custody and support); the labor pools of Sacramento, San Joaquin, and other nearby counties, and new employees who would relocate to the area. These factors were considered in evaluation of staff relocation to the area. Further, Impact 3.4-1a evaluated a worst-case scenario, and assumed that all 377 employees would be new and coming from out of region. Further, it should be noted that with the recent approval of SB 105, CRC in Norco, California would not be closed. Therefore, it is likely that additional new hires, rather than transfers from other facilities, could occur with the activation of the project.

L11-18 The comment expresses concern that the demand for housing that would be created by the proposed project may not be able to be met by the city's available housing supply. Please refer to Response to Comment L11-15 regarding housing demand.

The DEIR's analysis of employment, population, and housing indicates that the proposed project would result in less-than-significant impacts related to substantial population growth that would require the construction of new housing (see Impacts 3.4-2a and 3.4-2b of the DEIR, Volume 3). This conclusion is based on the current vacancy rate of residential units (3,155 units in the cities of Lone and Elk Grove, and over 68,004 units in Sacramento, Amador, and San Joaquin counties); the number of already constructed, approved, or pending residential development projects in the region (751 units in the city of Lone alone [see Table 4-1 in the DEIR, Volume 3]); and the likelihood that no single community would receive a substantial percentage of the increase in new residents. Therefore, in its analysis of whether the proposed project would induce population growth that would require new housing, the DEIR includes a data-driven discussion reflecting the abundant supply of existing and approved housing stock in the region.

However, to further cite evidence from the DEIR's analysis and in response to the comment referring to houses available for sale, an August 28, 2013 search of www.zillow.com indicates that the city currently has 21 houses listed for sale, 3 apartments/condos listed for rent, and 4 lots/land listed for sale (Zillow.com 2013). Further, it is reasonable to assume that substantially more housing is available in the surrounding area. Further, and importantly, if lone wishes to not accommodate new employees and their families, the City is not forced to approve new housing development.

- L11-19 CDCR agrees with the commenter's observation that Census data includes the institutional population as part of the total population. As a result of this comment, various portions of Section 3.4, "Employment, Population, and Housing," of the DEIR, Volume 3, have been revised as indicated below. These changes do not alter the conclusions of the DEIR and recirculation is not required.

Table 3.4-1 of the DEIR, Volume 3, has been revised as follows:

| Table 3.4-1 Geographic Distribution of Current MCSP Employees | | | | |
|--|---------------------|-----------------|---------------------------|---|
| County/City | 2000 Population | 2010 Population | Projected 2025 Population | Number (Percent) of MCSP Employees ¹ |
| Sacramento County | 1,223,499 | 1,418,788 | 1,643,263 | 430 (37%) |
| Amador County | 35,100 | 38,091 | 41,270 | 386 (33%) |
| San Joaquin County | 563,598 | 685,306 | 862,496 | 162 (14%) |
| Other counties | N/A | N/A | N/A | 182 (16%) ² |
| County Total | | | | 1,160 (100%) |
| City of lone ⁶ | 7,129 | 7,918 | 18,182 ³ | 200 (17%) |
| City of Elk Grove | 59,984 ⁴ | 153,015 | 168,465 | 129 (11%) |
| Other cities | N/A | N/A | N/A | 831 (72%) ⁵ |
| City Total | | | | 1,160 (100%) |

Notes:
¹ Number is approximate; zip code survey data do not match number of employees due to various factors. Numbers were adjusted to match the employment count.
² Less than 16% of MCSP employees reside in 20 other counties, each of which represents less than 7% of total employee population.
³ Projection is for the year 2030.
⁴ Elk Grove was incorporated as a city in July 2000. U.S. Census Bureau information for 2000 does not reflect this change.
⁵ Less than 72% of MCSP employees reside in 87 other jurisdictions, each of which represents less than 10% of total employee population.
⁶ Population data for the city of lone includes the institutionalized population, which according to the 2000 and 2010 Census was 3,832 and 4,160, respectively. Therefore, the non-institutionalized population was 3,297 and 3,758 in 2000 and 2010, respectively. The projected 2030 population shown in this table is from the *City of lone General Plan Update DEIR* (City of lone 2009a), which does not distinguish the institutionalized from the non-institutionalized population. Therefore, for purposes of this analysis, the 2010 Census data of 4,160 institutionalized people was deducted from the 2030 projection, resulting in a revised projection of 14,022 non-institutionalized people in 2030. This is considered to be a conservative estimate because MCSP has not had an inmate population that high to date, nor is it expected to in the future.
Sources: U.S. Census Bureau 2013a, 2013b, 2013c, 2013d, 2013e; California Department of Finance 2012; City of lone 2009; Sacramento County 2008; zip code data provided by CDCR in 2013

Page 3.4-4 of the DEIR, Volume 3, has been revised as follows:

City of lone

lone's population increased from 7,129 people in 2000 to 7,918 people in 2010, which was an increase of 9.9 percent (U.S. Census Bureau 2013d). As indicated in Table 3.4-1, approximately 17 percent of current MCSP employees reside in lone.

By 2030, the total population in lone is projected to be 18,182 people, an increase of 60.7 percent from 2000 (City of lone 2009:4.3-11).

As noted above in Table 3.4-1, population data for the city of lone includes the institutionalized population, which according to the 2000 and 2010 Census was 3,832 and 4,160, respectively. Therefore, the non-institutionalized population was

3,297 and 3,758 in 2000 and 2010, respectively. The projected 2030 population shown in Table 3.4-1 is from the *City of Lone General Plan Update DEIR* (City of Lone 2009a), which does not distinguish the institutionalized from the non-institutionalized population. Therefore, for purposes of this analysis, the 2010 Census data of 4,160 institutionalized people was deducted from the 2030 projection, resulting in a revised projection of 14,022 non-institutionalized people in 2030. This is considered to be a conservative estimate because MCSP has not had an inmate population that high to date, nor is it expected to in the future.

Impact 3.4-1a of the DEIR, Volume 3, has been revised as follows:

If this population increase occurs, it is anticipated that these 1,097 people would distribute themselves in a pattern similar to the existing regional MCSP employee distribution patterns. That is to say, the overwhelming majority (84 percent) of employees would be anticipated to reside in Sacramento, Amador, and San Joaquin Counties, and the remainder (16 percent) would be anticipated to reside in other outlying counties. As indicated in Table 3.4-1, Sacramento County would be expected to receive the largest portion of a project-related population increase (approximately 406 [37 percent] of the 1,097 people). The remaining employees and their families would be distributed throughout other adjacent and outlying counties (including Amador and San Joaquin Counties). The maximum project-generated population increase of 1,097 people would be indistinguishable from other projected growth in the region and is planned for in regional growth plans in each of these communities (e.g., general plans, community plans). For example, project-related population growth in Sacramento County of 406 people would represent 0.0247 percent of the County's projected 2025 population of 1,643,263 people (California Department of Finance 2012). At a more local level, project-related population growth in the city of Lone of 186 (17 percent of 1,097) people would represent 1.02 1.3 percent of the City's projected 2030 population of ~~18,182~~ 14,022 people (~~City of Lone 2009~~). This level of growth, by itself, would not stimulate any new development, the construction of which could result in significant environmental impacts.

Impact 3.4-1b of the DEIR, Volume 3, has been revised as follows:

If this population increase occurs, it is anticipated that these 562 people would distribute themselves in a pattern similar to the existing regional MCSP employee distribution patterns. That is to say, the overwhelming majority (84 percent) of employees would be anticipated to reside in Sacramento, Amador, and San Joaquin Counties, and the remainder (16 percent) would be anticipated to reside in other outlying counties. As indicated in Table 3.4-1, Sacramento County would be expected to receive the largest portion of any project-related population increase (approximately 208 [37 percent] of the 562 people). The remaining employees and their families would be distributed throughout other adjacent and outlying counties (including Amador and San Joaquin Counties). The maximum project-generated population increase of 562 people would be indistinguishable from other projected growth in the region and is planned for in regional growth plans in each of these communities (e.g., general plans, community plans). For example, project-related population growth in Sacramento County of 208 people would represent 0.013 percent of the County's projected 2025 population of 1,643,263 people (California Department of Finance 2012). At a more local level, project-related population growth in the city of Lone of 96 (17 percent of 562) people would represent ~~0.53~~ 0.68 percent of the City's projected 2030 population of ~~18,182~~ 14,022 people (~~City of Lone 2009~~). This level of growth, by itself, would not stimulate any new development, the construction of which could result in significant environmental impacts.

- L11-20 The comment states that the proposed project was not considered in the City's planning documents, and, therefore, has the potential to alter and accelerate the rate and nature of growth in the city. Please refer to Response to Comment L11-15. As noted in Impacts 3.4-1a and 3.4-1b in the DEIR, Volume 3, the population and employment growth expected with implementation of the infill development would not exceed the projections of local general plans in the communities surrounding the infill site. Regardless of whether the city has or has not specifically included this project in its planning documents, project-related population growth would be absorbed in local growth projections.
- Further, Section 5.3, "Growth Inducement," in the DEIR, Volume 3, explains that although the proposed project would foster some economic and population growth because of new employment opportunities, the growth would be widespread and dispersed in such a manner that any growth would be consistent with the projections of local general plans in the communities surrounding the site. The DEIR includes a detailed discussion of these local population projections in the environmental setting in Section 3.4, "Employment, Population, and Housing," in the DEIR, Volume 3.
- The comment asserts that due to the flawed analysis of the Population, Employment, and Housing section, the Public Services and Utilities sections are also flawed. Please refer to Responses to Comments L11-30 through L11-50 regarding Section 3.10, "Public Services," of the DEIR, Volume 3, and L11-62 through L11-75 regarding Section 3.12, "Utilities," of the DEIR, Volume 3.
- L11-21 The final drainage plans for the infill site would be reviewed and approved by the engineer of record from the design-build team for the proposed project. The engineer would ensure that potential stormwater flows from the infill site are appropriately detained onsite and in accordance with applicable requirements and would be discharged from the site at or below pre-project rates. This is a requirement of the mitigation that would be monitored through the approved Mitigation Monitoring and Reporting Program (see Mitigation Measure 3.7-2 on page 3.7-14 of Volume 3 of the DEIR). Therefore, CDCR anticipates only minor, if any, increases to flows in Mule Creek. The City does not have discretionary authority over the drainage improvements for the project. It is CDCR's responsibility to ensure that this mitigation and all adopted mitigation are followed and that the design of the facility conforms to the State Building Code (Title 24).
- L11-22 The comment infers that the City would not be a party to an agreement on the cost for providing spray fields and related facilities; CDCR believes this is not a correct statement. CDCR would need to come to an equitable agreement with the City and if not, would need to seek an alternative means of wastewater disposal. The development of a new offsite spray field is a component of the project. Separate from the CEQA process, CDCR would coordinate with the City for the funding of the construction and operation of the proposed spray fields. No additional CEQA evaluation is required; the additional 100 acre spray field is addressed in the DEIR. CDCR acknowledges that permitting for the new spray field by the Central Valley RWQCB may involve preparation of additional studies including a "Reclaimed Water Master Plan." But it is premature to prepare such a plan, if even necessary, until consultation with the Central Valley RWQCB has occurred. If the MCSP infill site is approved, CDCR will continue discussions with the City regarding the financial requirements for spray field expansion.
- L11-23 Noise travels and is attenuated in a predictable manner, following mathematical formulas. Noise at sensitive receptors can be calculated based on noise measurements taken elsewhere. The DEIR accurately characterizes the existing noise environment surrounding the infill site through measurements collected at four locations as shown in Exhibit 3.9-2 on page 3.9-7 of Volume 3. The commenter offers no specific evidence on how the noise analysis is inadequate; therefore, no further response can be provided.

- L11-24 During the noise measurements taken at the project site, there were other contributing factors, including vehicular noise, to the average and maximum noise levels shown in Table 3.9-1 of Volume 3 of the DEIR. While the noise levels shown do include noise attributable to the firing range, it is not possible to isolate the monitored noise associated with the use of the firing range from other monitored ambient noise. In other words, a variety of noise sources were measured; the important point is that typical and expected noise was measured.
- L11-25 The hours of operation of the MCSP firing range would be maintained with implementation of the proposed project. Use of the firing range varies according to available staff and the timing of specific weapons training. These conditions would be expected to continue with implementation of the project. Although the number of individuals that may use the range on an annual basis would increase, the availability of and timing of use of the MCSP firing range would not increase, and as a result, noise associated with the firing range is not anticipated to increase.
- L11-26 With regard to the evaluation of the project's noise impacts, relevant noise standards that were considered in the DEIR include both the City of Lone and Amador County noise standards because the property is located in the City of Lone and is surrounded by County properties. Therefore, sensitive receptors that could be subject to noise from the project are located in both jurisdictions. The analysis appropriately evaluates project-related impacts against City and County standards. The commenter provides no specificity on how the analysis is confusing, therefore, no further response can be provided.
- L11-27 Table 3.9-14 of Volume 3 of the DEIR evaluates the potential noise levels associated with use of the public address (PA) system from the infill site. As shown in this table, the PA system would generate noise levels no greater than 35 dBA at the nearest offsite residence. If the PA system were to be used at night, it is assumed that most residents would be located within their residences, which would result in a further reduction of exterior noise levels, including noise from the proposed PA system. Waking of individuals is considered to be possible at approximately 45 dBA (Finegold 2001). As noise from the PA system would be at a minimum 10 dBA lower than this threshold, nearby sensitive receptors would not be adversely affected.
- L11-28 Page 3.11-32 of Volume 3 of the DEIR has been amended as follows to reflect 417 proposed parking spaces versus 580:
- As noted in Chapter 3, "Project Description," of Volume 1, a complex would include no fewer than 417~~580~~ parking spaces, which is more than the peak demand on a typical weekday.
- CDCR's experience is that this would provide ample parking for those using the proposed complex. No new impacts would occur as a result of this change to the DEIR. Therefore, no additional analysis or recirculation of the DEIR is required.
- L11-29 The existing MCSP facility is part of the existing noise environment (i.e., ambient noise environment). These ambient noise conditions were considered through the ambient noise measurements taken at the site (please refer to Response to Comment L11-23). The analysis then applied the project's construction and operational noise levels to ambient noise levels at the site and on surrounding properties. Evaluation of a cumulative impact of the existing MCSP and the proposed infill facility is not required by CEQA as part of the DEIR or warranted. Stationary source noise generated by the proposed complex would be similar to the existing facility noise although noise associated with the administrative facilities at the existing MCSP would not occur at the infill site. In addition, the mobile source noise

generated by the existing facility reflects a higher level of traffic than would be generated by the proposed complex, and as a result, would be higher than the proposed complex.

- L11-30 The comment offers no evidence to support how the analysis is flawed; therefore, no further response can be provided.

Please refer to Responses to Comments L11-15 through L11-20 regarding the Population, Employment, and Housing analysis in Volume 3 of the DEIR.

- L11-31 The project's impacts to police services in the vicinity of MCSP were evaluated in Volume 3 of the DEIR, specifically Impacts 3.10-1a and b. The commenter offers no specifics as to how the project's impacts to police services were improperly evaluated; therefore, no further response can be provided.

- L11-32 The commenter's correction to the number of volunteer patrol officers is noted. The second paragraph on page 3.10-1 of Volume 3 of the DEIR, has been revised as follows:

The California Department of Corrections and Rehabilitation (CDCR) staffs the existing MCSP with 689 correctional officers equipped to manage site security (CDCR 2010). Throughout the remainder of the City of Lone, the Lone City Police Department provides law enforcement services, including traffic enforcement, patrol, and investigation (City of Lone 2009a). The Lone City Police Department staff includes a Chief of Police, three patrol officers, a K-9 officer, and 44 three volunteer patrol officers (~~Lone Police Department n.d.~~ Lone 2013). The Lone City Police Department has an average of 1.4 paid sworn officers per 1,000 residents, which is similar to the average ratio for California cities of 1.5 officers per 1,000 residents (City of Lone 2009b).

Note the analysis in the DEIR was based on information gathered from the City's website. A review of the Lone Police Department website on August 27, 2013 indicates that the department is currently staffed by one interim Chief of Police, four full-time patrol officers, one K9 (police dog), five part-time reserve patrol officers, and eight volunteer patrol officers, as well as various support staff (Lone Police Department 2013). However, CDCR will rely on the City's data included in its comment letter as the most current.

- L11-33 The comment requests that CDCR provide evidence to support the DEIR statement that communities with prisons are not linked to higher instances of crime. In 2008, CDCR prepared a study of the potential impacts of prisons on host communities, including property values, crime rates, and other various social and fiscal impacts resulting from inmate families in relocating near prisons to be near inmates (CDCR 2008).

The study analyzed whether the presence of a prison might cause an increase in crime by attracting criminal acquaintances of inmates. The study compared crime rates of Vacaville (location of the California Medical Facility and the California State Prison—Solano) and Delano (location of the North Kern State Prison and Kern Valley State Prison) to pre-prison data and comparable cities. The study found that the Delano crime rate was erratic, but, although it has climbed since 2004 (when a new prison was opened; an existing state prison was already in Delano), no association could be established between the crime rates and the opening of the new prison. However, Vacaville crime rates have remained below state rates since 1985, and the study found that no evidence exists that Vacaville crime rates are affected by the presence of prisons, which were in operation for the duration of the study period. The study concludes that crime rates are complex and affected by numerous social and economic factors beyond the control of local law enforcement agencies, and no evidence exists of a connection between crime rates and prisons in Delano or Vacaville (CDCR 2008:3).

The CDCR study concluded that the location of prisons within communities does not adversely affect property values or crime rates, that a very small number of families move to be near an inmate, and that no evidence exists that such families are more prone toward criminal behavior than the population at large.

With regards to increased demand for police services from construction and operation of the project, CDCR understands that local communities may bear an additional burden of public service impacts during construction, when heavy vehicles access the area. To address the project's construction-related traffic impacts, the DEIR includes Mitigation Measure 3.11-4, which requires CDCR to prepare a construction traffic management plan before construction and coordinate with applicable transportation entities, including the City of Lone. As part of this construction traffic management plan, CDCR will provide flagging and temporary traffic controls to ensure that motorist safety is maintained. CDCR will also commit to funding an additional officer and firefighter, and their equipment, during the construction period. The second full paragraph of Mitigation Measure 3.11-4 of Volume 3 of the DEIR has been modified as follows to provide more specific direction regarding coordination with the City of Lone.

To minimize potential impacts, the TMP will restrict, to the extent feasible, peak hour trips entering and exiting MCSF to 27 passenger car equivalents (PCEs). The TMP will include an updated evaluation of current operational characteristics of the roadways to determine if construction traffic would cause unacceptable operations. If so, the TMP will specify temporary mitigation as needed, including (but not limited to) temporary operational improvements (such as a temporary signal or flagging that would be developed in consultation with the applicable transportation entities) or limiting the hours or amount of construction trips on affected roadway segments. Additionally, CDCR shall reimburse the City of Lone for one police officer and one firefighter for the duration of infill construction and for three to six months following substantial activation. The salary and benefits will be based on the published PERS rate. CDCR shall also reimburse the City for the monthly cost of the rental/lease of a patrol vehicle and a used fire apparatus vehicle. Substantial activation of the project means when the new facility is 50% occupied. The TMP will also evaluate pavement conditions along the haul routes designated in the TMP, and, if necessary, specify mitigations to:

- ▲ avoid or minimize the use of haul routes where the pavement condition is physically deficient, according to each jurisdiction's standards, or
- ▲ enter into mitigation agreements to improve the physical condition of haul routes that are in a physically deficient condition.

Determination of whether the pavement condition is "acceptable" or "deficient" will be defined by the presiding jurisdiction's pavement management criteria.

Additionally, during coordination with the City of Lone regarding the construction traffic management plan, if the City of Lone maintains their concern regarding the need for public services, CDCR will include considerations, such as arranging with Amador County or the California Highway Patrol for the provision of additional police services in the event of an accident related to the construction of the proposed project.

- L11-34 As described in Response to Comment L11-19, based on the revised 2030 population estimate for the city of Lone (excluding the previously included institutionalized population), the proposed project (single facility or complex) would result in an increase of 0.68 and 1.3 percent, respectively (96/14,022 and 186/14,022, respectively), of the city's projected 2030 population. Notwithstanding this revision to the DEIR analysis, project implementation is expected to result in a less-than-significant effect on police services (see Impacts 3.10-1a and 3.10-1b) for the reasons described in Response to Comment L11-31. Further, the City

is responsible for approving development that would allow for increased population, and for funding mechanisms that would support services needed to service the population. CDCR is not responsible for the City's decisions regarding if and where they allow population-increasing development. If housing is not provided in the City, project employees would seek housing at any of the many nearby communities.

- L11-35 The comment notes that the DEIR does not address the potential effects on police services that could result from an increase in traffic from non-resident employees and visitors. Impacts 3.10-1a and 3.10-1b in the DEIR, Volume 3, discuss the project's potential impacts on police services in the city, and conclude project development would not create substantial demand for new police protection facilities in any one community; would provide for onsite security needs through the employment of 207 new correctional officers; and would result in a relatively small increase in the volume of calls to the Lone Police Department. No new police facilities or personnel would be required. This impact was therefore determined to be less than significant. It should be noted that based on concerns voiced by the City for potential calls for service for police during construction, although CDCR would provide appropriate flagging and traffic control to reduce potential safety concerns and the need for police services during construction, CDCR would temporarily fund an additional officer and patrol car. Refer to Response to Comment L11-33 for further clarification.

With respect to impacts during operation, although a limited increase in law enforcement presence may be required as a result of increased traffic on local roadways (onsite incidents would generally be handled by the correctional staff), the need for additional law enforcement is not typically based on traffic levels, and it is unlikely that a traffic-based increase in law enforcement would, by itself, constitute an increase in demand that would require construction of new law enforcement facilities. Further, if enforcement activities (issuing tickets) related to more people coming to the site were to occur, the fines associated with these activities could be used to fund additional enforcement personnel. The City provides no evidence that this type of impact would occur, including based on its own experience with a prison that has operated at MCSP since 1987 (over 25 years). Please refer to Response to Comment L11-33.

- L11-36 The comment regarding payment of fees to mitigate impacts on police services is noted. Please refer to Responses to Comments L11-3 and L11-33. As discussed, a significant impact on police services is not expected.
- L11-37 Please refer to Response to Comment L11-36.
- L11-38 The comment states that project construction would have a severe impact on traffic conditions in Lone, which would require the need for police services due to traffic congestion, vehicle code violations, and traffic accidents. Please refer to Response to Comment L11-33. Regarding additional congestion related to project traffic, CDCR will pay the City of Lone's traffic impact fee per DEIR Volume 3 Mitigation Measure 3.11-1, similar to any other project that produces traffic in the City.
- L11-39 Please refer to Response to Comment L11-33 regarding police services during project construction. Also, please refer to Response to Comment L11-3 regarding payment of fees to mitigate impacts on police services during project operation.
- L11-40 The comment asserts that due to the flawed analysis of the Population, Employment, and Housing section, the Public Services (fire services) analysis is also flawed. Please refer to Responses to Comments L11-15 through L11-20 regarding the Population, Employment, and Housing analysis in the DEIR, Volume 3.

- L11-41 The comment asserts that the DEIR fails to properly evaluate and disclose physical environmental effects that would result from the project's impacts to and depletion of fire services. The City does not provide specifics as to how the project's impacts were improperly evaluated and disclosed, so a direct response cannot be provided.

Existing fire protection services in the City of Lone are described on pages 3.10-1 and 3.10-2 of the DEIR, Volume 3. In particular, the DEIR states that, according to the *City of Lone General Plan Update DEIR* (City of Lone 2009a), Lone Fire Department's 90th percentile response time is 9.6 minutes throughout the service area. The median response time in the service area is 5.8 minutes. Impacts 3.10-2a and 3.10-2b discuss the project's potential impacts on fire services in the city, and conclude project development would not create substantial demand for new fire protection facilities in any one community; would generate few calls for offsite fire protection services; and would be designed consistent with State fire regulations. No new fire facilities or personnel would be required. This impact was therefore determined to be less than significant. Because the City does not provide evidence as to what constitutes a "lack of available public services," no further response can be provided. Further, although CDCR anticipates that appropriate construction methods and provision of MCSP Fire Department services would be adequate to ensure that potential wildland fire impacts during construction would not occur, CDCR acknowledges the City's concern for potential calls for service during construction and would provide funding to the City for an additional firefighter and leasing of a used fire apparatus vehicle during construction and for three to six months following substantial activation. Once activated, the prison would have additional onsite fire equipment and inmate fire fighters. Please refer to Responses to Comments L11-2 and L11-33 for further clarification.

- L11-42 As described in Response to Comment L11-19, based on the revised 2030 population estimate for the City of Lone (excluding the previously included institutionalized population), the proposed project (single facility or complex) would result in an increase of 0.68 and 1.3 percent, respectively (96/14,022 and 186/14,022, respectively), of the City's projected 2030 population. Notwithstanding this revision to the DEIR analysis, project implementation is expected to result in a less-than-significant effect on fire protection services (see Impacts 3.10-2a and 3.10-2b) for the reasons described in Response to Comment L11-41. Further, the comment suggests the City has no say in the growth that may occur within its city limits. The City has the ability to approve projects, deny them, or condition them to avoid impacts that have a nexus to the development. Finally, as shown in Comments L11-36 and L11-45, the City mitigates for the impacts of development on police and fire services through various mechanisms. Therefore, if the City allows for growth-inducing development, it also has the means to mitigate the impacts through its traditional development process.

- L11-43 The comment states that the DEIR analysis does not address impacts that could result from new employees and their families moving to areas within the Lone Fire Department's service area, but outside of the incorporated city limits. Existing fire protection services in the city of Lone are described on pages 3.10-1 and 3.10-2 of the DEIR, Volume 3. In summary, fire protection services in the project area are provided by the MCSP Fire Department and the City of Lone Fire Department. Additional aid is available from the California Department of Forestry and Fire Protection (CAL FIRE).

New employees and their families that relocate to areas within the Lone Fire Department's service area, but outside of the incorporated city limits, would be served by the Lone Fire Department. For the reasons described in Response to Comment L11-41, project implementation is expected to result in a less-than-significant effect on fire protection services (see Impacts 3.10-2a and 3.10-2b of the DEIR, Volume 3). Further, as described in Response to Comment L11-42, the City has its own mechanism to mitigate for increased demands in police and fire services associated with new development it approves.

L11-44 Impacts 3.10-2a and 3.10-2b discuss the project's potential impacts on fire services in the City, and conclude project development would not create substantial demand for new fire protection facilities in any one community; would generate few calls for offsite fire protection services; and would be designed consistent with State fire regulations. No new fire facilities or personnel would be required. This impact was therefore determined to be less than significant. The commenter offers no other evidence to demonstrate that significant fire service impacts would occur; therefore, no further response can be provided. Further, as also stated in Response to Comment L11-35 regarding police services, this concern related to a "drastic increase" in demand is not supported by any evidence despite the fact that MCSP has been in operation since 1987, over 25 years.

L11-45 The comment regarding payment of fees to mitigate impacts on fire protection services is noted. Please refer to Responses to Comments L11-3 and L11-33.

L11-46 Please refer to Response to Comment L11-45.

L11-47 The comment regarding the lone Fire Department's increased call volume during construction of the existing MCSP is noted. Please refer to Response to Comment L11-2.

L11-48 Impacts 3.10-2a and 3.10-2b discuss the project's potential impacts on fire services in the City, and conclude project development would not create substantial demand for new fire protection facilities in any one community; would generate few calls for offsite fire protection services; and would be designed consistent with State fire regulations. No new fire facilities or offsite personnel would be required. This impact was therefore determined to be less than significant.

It should be noted that every state prison in California, including MCSP, has the same number of fire services positions, which include one Fire Chief, one hazardous materials specialist, and four fire captains. For those state prisons with two facilities (e.g., Folsom, which contains Folsom State Prison and Folsom Women's Facility), a fifth fire captain is added and would be included as part of the proposed project.

L11-49 The comment states that fire flow is not analyzed in the DEIR and that the proposed project would require a minimum of 2 million gallons of water storage. Adequate water storage is proposed as a component of the proposed project, as described on page 2-6 of the DEIR, Volume 3, which states:

...In addition, CDCR would construct a water storage tank (approximately 3,500,000 gallons in capacity) adjacent to the level II infill correctional facility and within the infill site to provide redundant supplies to the infill site and MCSP, in the event that supplies are temporarily unavailable via the existing pipeline system.

As described above, adequate water storage for fire flow, as well as backup domestic demand, is proposed as part of the proposed project, and the environmental impacts of installing the proposed water storage tank are analyzed throughout the DEIR. Prior to construction, all fire control and response elements of the proposed project will require review and approval by the State Fire Marshal. Further, the design-build entity will prepare a more precise modeling evaluation that confirms water pressure requirements as part of their development package.

L11-50 The comment states that fire hazards are not disclosed as a potential impact in the DEIR. However, wildland fire impacts are addressed in Section 3.6, "Hazards and Hazardous Materials," in the DEIR, Volume 3 (see Impacts 3.6-2a and 3.6-2b). In summary, although the proposed project would be located in an area of high fire hazards, CDCR has appropriate fire protection services and measures in place to prevent the loss, injury, or

death of people or structures as a result of a wildfire. For these reasons, this impact was determined to be less than significant. Nonetheless, CDCR acknowledges the City's concern regarding potential risk of wildland fires during construction and resulting calls for service to the Lone Fire Department. As noted in Response to Comment L11-33, Mitigation Measure 3.11-4 of Volume 3 of the DEIR has been modified to include provision of funding for an additional firefighter and lease of a used fire apparatus vehicle during construction and for three to six months following substantial activation. Once activated, the prison would have additional onsite fire equipment and inmate fire fighters.

- L11-51 Tables 3.11-5 through 3.11-8 in Volume 3 of the DEIR include information related to project-related traffic during the "regular peak hours." Please refer to the data included under the headings "AM Peak Hour of Adjacent Street Traffic" and "PM Peak Hour of Adjacent Street Traffic." No additions to or modifications of the analysis of the DEIR is necessary or required.
- L11-52 With regard to evaluation of weekend traffic, as stated in the DEIR, a quantitative analysis was not considered necessary because weekend traffic in the area is generally considered to be lower than weekday traffic. However, in response to the comment, traffic counts were taken for a full week in August 2013 (between August 23 and August 29) on State Route 104 adjacent to the MCSP driveway. As shown in the figure below, weekday traffic volumes on SR 104 ranged from 3,941 on Monday to 4,473 on Friday. Weekend traffic volumes were 3,206 on Saturday and 2,808 on Sunday. Traffic volumes on weekdays are 40 percent higher on average than on weekends.

The DEIR analyzed trip generation of the project under the following four weekday time periods:

- ▲ 5:30 a.m. to 6:30 a.m. – which is the morning shift change
- ▲ The a.m. peak hour of the adjacent street traffic - which is typically between 7 a.m. and 9 a.m.
- ▲ 1:30 p.m. to 2:30 p.m. – which is the afternoon shift change
- ▲ The p.m. peak hour of the adjacent street traffic – which is typically between 4 p.m. and 6 p.m.

Tables 3.11-5 and 3.11-7 of the DEIR reported that the project would generate 764 weekday trips and 964 weekend day trips, respectively. Those tables also showed the number of project trips that would be generated on a weekday and a weekend day for the four time periods listed above.

For comparison purposes, the following exhibit and table were prepared to compare the existing plus project volumes for weekdays and weekend days for each of the periods listed above. As shown, the existing plus project traffic volumes are higher on weekdays than on weekend days during the 5:30 a.m. to 6:30 a.m. hour, the a.m. peak hour between 7 a.m. and 9 a.m., and the p.m. peak hour between 4 p.m. and 6 p.m. The existing plus project volumes during the 1:30 p.m. to 2:30 p.m. hour are about the same on weekdays as on weekend days. With the project, the surrounding roadway system would have more traffic on weekdays than on weekend days for the entire day and during the time periods listed above, with the exception of the 1:30 p.m. to 2:30 p.m. hour when the traffic on the weekend is about equal to the weekday. These results clearly support the rationale that additional weekend traffic analysis is not necessary and would not result in additional traffic impacts.

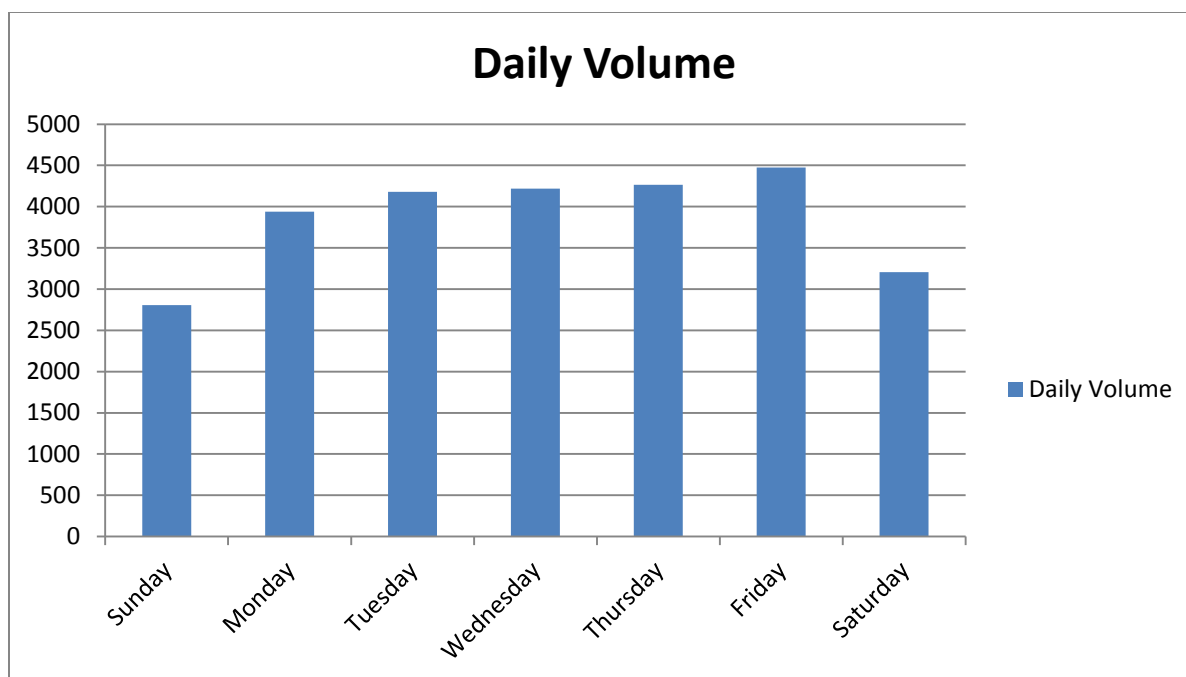


Exhibit 3-1

Daily Roadway Volumes Along SR 104

| Time Period | Sunday (8/25/13) | Monday (8/26/13) | Tuesday (8/27/13) | Wednesday (8/28/13) | Thursday (8/29/13) | Friday (8/23/13) | Saturday (8/24/13) |
|---------------------|---------------------|---------------------|----------------------|------------------------|-----------------------|---------------------|-----------------------|
| 5 to 6 am | 102 | 248 | 259 | 253 | 240 | 232 | 120 |
| 6 to 7 am | 67 | 355 | 389 | 378 | 355 | 324 | 109 |
| 7 to 8 am | 98 | 320 | 305 | 324 | 317 | 301 | 137 |
| 8 to 9 am | 130 | 218 | 256 | 202 | 237 | 231 | 163 |
| 9 to 10 am | 151 | 188 | 161 | 211 | 189 | 199 | 188 |
| 10 to 11 am | 191 | 205 | 218 | 225 | 235 | 252 | 222 |
| 11 to Noon | 245 | 211 | 207 | 234 | 240 | 315 | 225 |
| Noon to 1 pm | 200 | 200 | 218 | 220 | 231 | 241 | 218 |
| 1 to 2 pm | 281 | 236 | 257 | 267 | 271 | 297 | 271 |
| 2 to 3 pm | 215 | 281 | 323 | 312 | 336 | 330 | 215 |
| 3 to 4 pm | 241 | 300 | 357 | 338 | 361 | 365 | 256 |
| 4 to 5 pm | 173 | 319 | 286 | 300 | 313 | 328 | 192 |
| 5 to 6 pm | 144 | 243 | 266 | 256 | 239 | 248 | 172 |
| 6 to 7 pm | 115 | 158 | 165 | 176 | 177 | 185 | 119 |

- L11-53 The existing inmate transfer system operates between all existing CDCR facilities, as well as (on an as-needed basis) other facilities (e.g., local jails). Therefore, with regards to the routes that would be taken, it is impossible to predict whether, on a daily basis, these trips would access the infill site from Stockton, Folsom, or some other destination. Further, in recognition of the commenter's concern, it should be noted that, upon further evaluation, the DEIR overstated the potential number of inmate transfers traveling to and from the infill site. While the DEIR's statement on page 3.11-3 of Volume 3 that weekday a.m. and p.m. peak-hour trips associated with inmate transfers would be "less than five per day", a more

reasonable estimate of peak hour trips associated with inmate transfers would be less than one per day or approximately 2 transfers per week, based on existing inmate transfers to and from MCSP. This volume would be considered minimal, and, in and of itself, it would be virtually indistinguishable from existing background trips, and a quantitative evaluation as part of the Final EIR would not result in any changes to the conclusions presented in the DEIR.

- L11-54 The DEIR does not improperly defer analysis as suggested in this comment. The statement regarding “planning-level analysis” follows the setting discussion for roadway segment methodology and more specifically a description of the thresholds set in the Amador County Regional Transportation Plan (RTP). The antecedent that is referred to in “[t]his planning-level analysis” is the RTP, not the analysis contained in the DEIR. Rather, the more detailed operational analysis that is addressed later in the paragraph (referred to in this comment) is the analysis of potential roadway segment impacts of the proposed project.
- L11-55 Quantitative analysis is not required in order to accurately evaluate the potential construction traffic impacts of the proposed project nor is it required prior to approval of the project. Consistent with the requirements of CEQA, the mitigation measure included as part of Impact 3.11-4 of Volume 3 of the DEIR includes a performance metric that would reduce impacts to a less-than-significant level. Based on the projected intensity of construction at certain times during the construction period, CDCR anticipates that this performance metric would be exceeded, thereby resulting in a significant and unavoidable impact even with the implementation of all feasible mitigation measures. Until such time as a contractor and specific vendors for construction materials are selected a quantitative analysis would not be feasible and would not alter the significance conclusions already included in the DEIR. Therefore, the analysis of the DEIR with respect to construction traffic is considered adequate and prepared in accordance with CEQA requirements. Also, please see Responses to Comments L11-2 and L11-33, both of which address CDCR’s commitment to funding an additional police and fire fighting position during construction.
- L11-56 CDCR will consider the suggested measure provided by the City during preparation of the construction traffic management plan. However, delivery trucks and other large vehicles have been observed traveling through downtown without resulting in physical damage to local businesses. Damage to local businesses and potential risks to pedestrians and motorists as a result of potential truck conflicts are not anticipated. Large commercial vehicles are common on the main thoroughfare through the City of Lone since two state highways, SR 104 and SR 124, course through the center of the city.
- L11-57 Potentially significant impacts related to City facilities, per the City’s level of service (LOS) standards, were not identified as part of the DEIR. Therefore, payment of fees to mitigate potentially significant impacts of the project, per the City’s criteria, was not recommended in the DEIR. However, as noted in Responses to Comments L11-2 and L11-3, CDCR recognizes it will contribute a substantial level of traffic to City streets, and therefore will pay the City traffic impact fees.
- L11-58 The comment requests clarification as to the feasibility of Mitigation Measure 3.11-1 and whether CDCR would still contribute regional, and city, traffic fees which could be applied towards improvement of the intersection (at the discretion of these agencies). Please also refer to Responses to Comments L11-2 and L11-3. Further, the last paragraph on page 3.11-27 of Volume 3 of the DEIR has been clarified as follows:

Signalization of the SR 104/SR 88/Jackson Valley Road intersection would reduce the delay at the intersection to an acceptable level during the p.m. peak hour. This intersection meets the peak hour signal warrant based on the requirements outlined

in the MUTCD even under existing (without the proposed complex) conditions. Implementation of this mitigation measure would provide LOS B operations with the level II infill correctional facility complex. However, implementation of this improvement (signalization) ~~Mitigation Measure 3.11-4~~ is within the responsibility and jurisdiction of another public agency, Caltrans, and not CDCR. Further, Caltrans and Amador County have indicated that there are no proposed or planned improvements at this intersection and thus, payment of regional transportation fees would not be expected to result in direct improvement of this intersection. Since signalization is not a planned improvement and could not be guaranteed prior to initiation of operation of the proposed complex, operations at the intersection of SR 104, SR 88, and Jackson Valley Road would likely continue to be unacceptable. In addition, as noted above, operations at two study intersections would not exceed City of Lone LOS standards for the intersection, but would, with and without the proposed complex, exceed Caltrans standards for those state facilities. Improvement of these intersections would likely have secondary impacts, especially related to removal or modification of historic resources, which would likely be significant due to the presence of a nearby historic district (refer to Section 3.3, "Cultural Resources" of this volume). As a result, implementation of this mitigation at the two City of Lone intersections is considered infeasible. As a result, impacts to intersections would be significant and unavoidable with implementation of the proposed complex.

L11-59 The comment is incorrect that the DEIR did not discuss weekend parking demand and is referred to the first full paragraph on page 3.11-32 and the first paragraph on page 3.11-64 of Volume 3 of the DEIR. The following information is provided as additional detail of the analysis.

As noted on pages 3-7 and 3-8 of Volume 1 of the DEIR, the level of parking to be provided onsite with either a single, level II infill correctional facility (207 parking spaces) or a level II infill correctional facility complex (417 parking spaces) was determined based on custody staff and visitor projections, which, as stated in the comment, could result in greater parking demand than staffing (custody and support) on weekdays. As stated on page 3-7, potential parking demand was calculated through a "combination of the [custody] staff totals for the second and third watches... plus an estimate of the number of visitors the facility would receive based on the facility's population." Looking specifically at the proposed complex at MCSP, this calculation results in a combined custody staff parking demand of 179 (113 second watch staff plus 66 third watch staff), which would only occur for approximately 2 hours during the day. The anticipated number of visitors for the entire day (238) is then added to determine the potential parking demand and necessary supply for the proposed complex. Based on CDCR's experience with other facilities, including MCSP, assuming 15 percent of inmates could receive a visitor on a given day is a conservative estimate and valid for determining what could happen with implementation of the proposed project. It should also be noted that the existing MCSP includes additional surface parking lots southeast of the existing prison administration facility that could accommodate additional overflow parking demand in the event of an unforeseen event that would temporarily increase visitation on a given day. Adequate parking would be provided within the grounds of the existing prison; visitor security review would continue to occur at the main entrance to the prison. CDCR believes that no significant impacts would occur as a result of inmate visitation to the proposed infill facility.

L11-60 As noted above in Response to Comment L11-59, 417 parking spaces would be provided as part of a level II infill correctional facility complex.

L11-61 Please refer to Response to Comment L11-3.

- L11-62 Because the level II infill facilities that would be constructed and operated as part of the proposed project would be operated under the authority of the respective adjacent prison(s), the degree of administrative staffing necessary for a stand-alone prison would not be required. As a result, the overall staffing for the project is less than that of the existing facilities. Further, as noted on page 3-13 of Volume 1 of the DEIR, the proposed level II infill correctional facilities would meet or exceed Leadership in Energy and Environmental Design (LEED) Silver standards. In so doing, the proposed facilities would include more water efficient fixtures, such as toilets and faucets, which would result in reduced water consumption and wastewater generation. Finally, the existing MCSP operates facilities, such as laundry, administrative spaces, and certain food preparation facilities, that would not be constructed at the infill site; therefore, water demand for the infill facility would be proportionately less. The water demand estimates were developed based on demand generated by similar CDCR facilities (e.g. California State Prison, Corcoran) and therefore present the best available information to estimating the proposed facility's demands.
- L11-63 As noted in this comment, the language included in CEQA Guidelines Section 15155 specifically applies to city and county lead agencies and not to state lead agencies. However, consistent with the commenter's request, the DEIR did provide an evaluation of impacts consistent with the intent of CEQA Guidelines Section 15155 although a formal water supply analysis study was not required. As shown on pages 3.12-2 through 3.12-6 and 3.12-9 through 3.12-12 of Volume 3, the DEIR did evaluate the potential impacts to and availability of water supplies in the vicinity of each of the infill sites. This evaluation included coordination with the local water purveyor, which (in the case of MCSP) is AWA. No further analysis or documentation is considered necessary. Moreover, the comment does not identify any shortcomings in the water supply impact analysis that was provided in the DEIR.
- L11-64 Adequate fire flow would be incorporated as part of the proposed project, and as such, potential impacts to offsite facilities was not necessary. As stated on page 2-6 of Volume 3 of the DEIR, approximately 3,500,000 gallons of water storage would be provided via a water storage tank at the infill site. Further, as noted above, MCSP includes its own fire department that would respond to calls for service at the infill site once it is completed and activated. Due to the fact that development of the MCSP Infill Site with level II infill correctional facilities would include water storage that exceeds the comment's suggested storage requirement by 1,500,000 gallons, no additional impacts are anticipated. The State Fire Marshal is responsible for reviewing and approving all fire response requirements on state prison projects including this proposal.
- L11-65 AWA includes consideration of existing agreements when determining available capacity and the potential need to expand water treatment capacity, including at the Lone Water Treatment Plant (WTP). The existing joint powers agreement (JPA) between CDCR and AWA allows for CDCR to use up to 1,085,000 gpd of treated water. AWA has not requested CDCR to reduce its demand due to decreasing capacity, nor have they indicated a potential issue related to capacity at and/or planned upgrades to the Lone WWTP. Based on available information provided by AWA, adequate capacity is available. Additionally, CDCR's demand at MCSP, inclusive of the proposed project, would be less than historical demand in 2007. It should also be noted that AWA did not raise any concerns as part of the public review periods for the NOP or the DEIR related to available capacity of the Lone WTP.
- L11-66 Impacts related to the amount of backwash that could potentially result from the treatment of potable water supplies at the Lone WTP are not the responsibility of CDCR. AWA is the agency responsible for evaluating such impacts. Because CDCR would not exceed its agreement for water with AWA and in general water demands would be at or below 2007 historical water demands for MCSP, potential increases in backwash beyond what has previously been projected and planned for is not anticipated.

- L11-67 Please refer to Response to Comment L11-62 for a reply to this same issue.
- L11-68 The comment is mistaken in its statement that the DEIR states that the MCSP WWTP would be “pushed to the limit.” The DEIR does not include such a statement, and as shown in Impact 3.11-2a, beginning on page 3.12-13 of Volume 3, adequate capacity at the MCSP WWTP is available to accommodate the proposed project. Contrary to the commenter’s assertion, mitigation is not required when the action is either part of the proposed project or part of regulatory compliance. In this case, both of the aforementioned conditions apply to the project. CDCR would, as part of the proposed project, modify the acreage of spray fields to be used for the disposal of effluent. As such, amendment of the existing WDR Order No. 05-00-088 would be required and would necessitate coordination with the Central Valley RWQCB. Additionally, CDCR is in the process of implementing upgrades to the existing MCSP WWTP, which also requires coordination with the RWQCB, as part of compliance with the existing WDR Order No. 05-00-088 for MCSP. Therefore, mitigation requiring coordination is neither necessary nor warranted. Further, requiring coordination, in and of itself, as mitigation does not assure that improvements would be implemented.
- It should also be noted that, as part of existing WDRs, CDCR consistently coordinates with and submits regular reports documenting performance of its WWTP and effluent disposal systems to the Central Valley RWQCB.
- L11-69 CDCR has reviewed the utilities analysis and found one incorrect reference to a NPDES permit. The second-to-last sentence of the third paragraph on page 3.12-7 of Volume 3 of the DEIR has been revised as follows:
- Upgrades include a secondary clarifier, a mixed liquor splitter box, a chlorine contact basin, a disinfected secondary effluent pump station, motor speed controls for return activated sludge pumps, and other improvements designed to bring the plant into compliance with WDRs ~~NPDES permit requirements~~ and to discharge the cease-and-desist order.
- The modification of this text does not change the conclusions of the DEIR. Recirculation of the DEIR would not be required.
- L11-70 Based on the current planning and design of the proposed offsite spray fields, no changes to City WWTP facilities would be required. As a result, the DEIR did not evaluate the potential impacts associated with improvements, because none were determined to be necessary.
- L11-71 It is CDCR’s intention to coordinate with the City of Lone for the development and operation of new offsite effluent spray fields on one or more existing non-irrigated agricultural situated west of town. Implementation of this plan would have potential benefits to not only CDCR but also the City and ARSA since it would involve infrastructure improvements to the local effluent disposal system. As noted elsewhere in this FEIR, CDCR has proposed to contract with the City for the development and operation of spray fields that would accept all or a significant portion of the treated effluent produced annually by the prison. If the City declines to implement this plan then CDCR will consider contracting directly with the subject landowner for the operation of offsite effluent spray fields. Alternately, CDCR will consider improving the efficiency of its existing spray fields on the prison grounds.
- L11-72 Based on the proposed locations of effluent spray fields (i.e. water reclamation areas) and the City’s WWTP, the DEIR evaluated the extension of PVC C900 pipe westward from the existing ponds along Old Stockton Road to the spray fields proposed as part of CDCR’s project. This potential route was evaluated based on perceived constraints related to Sutter Creek and other biological resources. However, because final engineering drawings have

yet to be prepared and the final design of the extended infrastructure will depend on the City's initial construction of its project, the exact location of the proposed infrastructure was not identified graphically as part of the DEIR. Nonetheless, the DEIR did evaluate potential impacts along the aforementioned corridor and included this analysis appropriately within the various sections of the DEIR. Further analysis of the construction of these facilities is not considered necessary so long as the proposed infrastructure remains within the corridor that was evaluated. If, upon further design and planning, the proposed infrastructure would extend outside of the corridor evaluated, CDCR would supplement the analysis of the DEIR as necessary and in compliance with CEQA requirements.

L11-73 Please refer to Response to Comment L11-22. The preparation of a reclaimed water master plan is not considered necessary to ensure that significant impacts with respect to effluent disposal do not occur.

L11-74 The comment is noted. CDCR recognizes that an agreement is not currently in place for the disposal of CDCR-treated effluent by the City. However, CDCR has conducted extensive outreach and meetings with City staff regarding the feasibility of this component of the project. Based on the outcome of those meetings, including a February 28, 2013 meeting between CDCR, the City of Lone, ARSA, and others, the transfer of disinfected treated effluent was considered feasible and the City did not indicate any substantial concerns. Based on these indications of feasibility, as well as continued meetings between CDCR and the City, CDCR included this as a component of the proposed project. Should this component be determined at a later date to be infeasible, CDCR would be responsible for evaluating alternative methods for disposal of the effluent intended to be transferred to the City and evaluate a selected alternative method pursuant to CEQA.

L11-75 Please refer to Response to Comment L11-73.

L11-76 The comment questions if a light study was completed for the DEIR analysis. As described on page 3.13-1 of the DEIR, Volume 3:

The visual resources analysis is based on field surveys of the infill site and surrounding areas and interpretation and analysis of existing views of the infill site and surrounding area. Visual simulations are used to draw conclusions regarding the appearance and effects of the contemplated development on visual resources.

Further, page 3.13-3 of the DEIR, Volume 3 states:

A field reconnaissance was conducted in January of 2013 to survey potential viewing points that would represent common views toward the MCSP Infill Site. Photographs were taken from various viewpoints outside the prison facilities to determine the visibility of the infill site from public roads, public open space areas, and residential areas. Representative viewpoints were selected based on visibility of the site (unobstructed or partially obstructed views) and on the sensitivity of the potential viewers. Based on the reconnaissance, three viewpoints were selected for detailed analysis, including visual simulations. Nighttime photographs were taken from these viewpoints on March 27, 2013.

As described in Impacts 3.13-3a and 3.13-3b, the simulated nighttime views from three viewpoints in the area surrounding the infill site show that terrain and/or trees mostly block or screen the lights from the selected viewpoints. For this reason and also because the proposed project would be set far enough back from offsite areas that the lighting associated with the facility would not substantially alter nighttime light conditions in the surrounding area, this impact was determined to be less than significant.

- L11-77 The comment notes that the analysis does not address impacts on views from homes on nearby hilltops that may include the proposed project in their viewsheds. CDCR disagrees. Further, CEQA case law, specifically *Mira Mar Mobile Community v. City of Oceanside* (2004), determined that “[u]nder CEQA, the question is whether a project will affect the environment of persons in general, not whether a project will affect particular persons.” It should be noted that to the extent feasible, CDCR did both during evaluation of the proposed project. During public scoping for this project, CDCR requested input on the locations to use for the visual simulations and members of the public were allowed to request specific evaluations. One location, the view east from the Toma Property (Viewpoint 3), was identified as a representative viewpoint, and, as such, was evaluated in the DEIR. The DEIR also evaluated two publicly accessible points along SR 104 and Waterman Road.

L12



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August 16, 2013

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**COMMENTS ON THE CALIFORNIA DEPARTMENT OF CORRECTIONS AND
 REHABILITATION DRAFT ENVIRONMENTAL IMPACT REPORT FOR LEVEL II
 INFILL CORRECTIONAL FACILITIES PROJECT**

Dear Mr. Sleppy:

The County of San Diego (County) has received and reviewed the Draft Environmental Impact Report (DEIR) for the California Department of Corrections and Rehabilitation (CDCR) Level II Infill Correctional Facilities Project dated June of 2013. The County, as a responsible agency under CEQA Section 15381 for infill at RJ Donovan Prison, appreciates the DEIR overview meeting that took place on July 15, 2013 and appreciates this opportunity to comment.

L12-1

County Planning & Development Services (PDS), Department of Public Works (DPW), Department of General Services (DGS), Fire Authority, and Sheriff Department have completed their review. Most of the County's Notice of Preparation comments from February of this year have been addressed in the DEIR. PDS staff has some additional comments regarding the analysis of the RJ Donovan Facility as follows.

Transportation/Traffic

1. The proposed project results in a direct traffic impact to the Otay Mesa Road/Alta Road intersection. The proposed mitigation measure for the project's direct

L12-2

Mr. Sleppy
August 16, 2013
Page 2 of 3

- impact is to signalize the intersection. The RJ Donovan traffic study projects that the signal will be warranted based on existing traffic conditions, the project's added traffic, and the expected growth in traffic for the East Otay Mesa area by the Year 2016 which is when the RJ Donovan infill is expected to be completed. Traffic signal warrants must be met at the time the signal is proposed to be installed. When available, the signal warrant analysis should be reviewed by County DPW Traffic staff. L12-2 cont'd
2. Early coordination with the County is encouraged for the review of the project's improvement plans for the Otay Mesa Road/Alta Road intersection. In addition to the installation of the traffic signal, other intersection improvements may be required in conjunction with the signal. L12-3
 3. It should be noted that the installation of a new traffic signal is a traffic regulatory measure that requires approval by the County Board of Supervisors. The project applicant should coordinate with the DPW Traffic section to initiate the process for Board consideration of the proposed traffic signal. The process includes going through the Traffic Advisory Committee. It is anticipated that the review of the item and consideration by the Board of Supervisors will take approximately four months, so please contact the DPW Traffic section as early as possible. L12-4
 4. The County's Public Road Standards and East Otay Mesa Specific Plan should be considered for all proposed roadway design improvements. L12-5
 5. Any work within the County's right-of-way will require permits from the County. L12-6
 6. Payment of the County's Transportation Impact Fees (TIF) would be required at the time the project obtains County permits. The applicant can coordinate with the PDS Land Development Transportation Planning section for determining the project's TIF fee calculation. L12-7
 7. The project applicant should coordinate directly with the City of San Diego for impacts to City roadway facilities. L12-8
- Multiple Species Conservation Program (MSCP)**
8. The DEIR based some of its analysis on the assumption that the RJ Donovan property is designated as "Take Authorized" in the County's MSCP. Some research revealed that these State-owned lands were not a part of the MSCP Plan. Figure 1-2 entitled "South County Segment" of the Subarea Plan mapped the property as "State Jail Facility." This document is available at: L12-9

Mr. Sleppy
August 16, 2013
Page 3 of 3

http://www.sdcounty.ca.gov/pds/mscp/docs/SCMSCP/MSCP_County_Subarea_Plan.pdf. Therefore, the DEIR should be updated to reflect the project site is not within the MSCP and is designated as State Jail Facility.

L12-9 cont'd

The County of San Diego appreciates the opportunity to continue to participate in the environmental review process for this project. We look forward to receiving future environmental documents related to this project or providing additional assistance at your request. If you have any questions regarding these comments, please contact Mindy Fogg, Planning Manager at (858) 694-3831 or email mindy.fogg@sdcounty.ca.gov.

L12-10

Sincerely,



DARREN GRETTLER, Assistant Director
Planning & Development Services

e-mail cc:

Michael De La Rosa, Policy Advisor, Board of Supervisors, District 1
Megan Jones, Group Program Manager, LUEG
Brian Sampson, Support Services Director, Sheriff Department
Megan Hamilton, Group Program Manager, Department of Parks and Recreation
Richard Chin, Associate Transportation Specialist, Department of Public Works
LeAnn Carmichael, Group Program Manager, Department of Public Works
Nick Ortiz, Project Manager, Department of Planning & Development Services
Mindy Fogg, Planning Manager, Department of Planning & Development Services
David Wick, Chair, East Otay Mesa Property Owners Association

| Letter L12 Response | Darren Gretler, County of San Diego Planning & Development Services August 16, 2013 |
|------------------------------------|---|
| L12-1 | Introductory remarks to the comment letter are noted. No specific comments addressing the environmental analysis were raised; therefore, no further response can be provided. |
| L12-2 | The need for County DPW Traffic staff to review the signal warrant analysis for the Otay Mesa Road/Alta Road intersection is noted. Upon completion of the analysis, CDCR will submit the analysis for review and comment by the County. |
| L12-3 | The comment is noted. CDCR will coordinate with the County of San Diego and will fully fund the signalization and improvement of the intersection of Otay Mesa Road and Alta Road, as noted in Mitigation Measure 3.11-1a in Volume 2 of the DEIR. |
| L12-4 | The comment is noted. CDCR will coordinate as early as possible with the DPW Traffic Section to initiate the process for Board consideration of the proposed traffic signal. |
| L12-5 | The comment is noted. CDCR will consider all relevant local plans and policies when designing roadway improvements. |
| L12-6 | The comment is noted. CDCR will obtain all necessary permits from the County for work within the County's right-of-way. |
| L12-7 | The comment is noted. Mitigation Measures 3.11-6a and 3.11-6b in Volume 2 of the DEIR address CDCR's contribution to the County's Traffic Impact Fees (TIF). CDCR will coordinate calculation and payment of the TIF with the PDS Land Development Transportation Planning section. |
| L12-8 | The comment is noted. As necessary, CDCR will coordinate directly with the City of San Diego for impacts to City roadway facilities. |
| L12-9 | The text has been modified to indicate that the RJD Infill Site is not within a take authorized area in the County's MSCP. Please refer to Response to Comment F1-8. |
| L12-10 | Contact information for County of San Diego is noted. |

Amador Regional Sanitation Authority



"Servicing Amador City, Martell, & Sutter Creek"

L13

August 19, 2013

California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827
CDCR_infill@ascentenviromental.com

COMMENTS ON DRAFT ENVIRONMENTAL IMPACT REPORT, LEVEL II INFILL CORRECTIONAL FACILITIES PROJECT, MULE CREEK STATE PRISON AMADOR COUNTY

To Whom It May Concern:

The Amador Regional Sanitary Authority (ARSA) appreciates the opportunity to submit the following comments regarding the proposed alternative 1,584-bed duplex or 792-bed expansion at the Mule Creek State Prison (MCSP) by the California Department of Corrections (CDCR). Either alternative of this proposed expansion is referred to as the Project.

ARSA's Interests Affected by the Project

ARSA is a joint powers authority formed by the Cities of Sutter Creek and Amador City and Amador County Service Area #4 (Martell). ARSA provides sewer and wastewater disposal and treatment services within its jurisdiction. As part of these services, ARSA has entered into various agreements with other wastewater providers in the area. Applicable to these comments, ARSA has executed the "Agreement to Regulate Use of Henderson/Preston Wastewater Disposal System" dated September 18, 2007 (Use Agreement) along with CDCR and the City of Ione. Under the Use Agreement, CDCR and ARSA are permitted to discharge a total of 650 acre feet (af) of treated wastewater per year into Preston Reservoir. Of this 650 af, 300 af may be discharged by CDCR. This discharge right is a vital part of ARSA's wastewater disposal system. The Use Agreement has a term of thirty years.

L13-1

To help implement the Use Agreement and to ensure CDCR retains its water rights, ARSA and the CDCR have entered into that Ground Lease No. L-2070 dated January 1, 2009 (Lease) under which CDCR has leased the Henderson/Preston System (as defined in the Lease) to ARSA. Under the Lease, ARSA is required to discharge at least 250 af per year and permitted to discharge up to 1,100 af per year from the Sutter Creek diversion point. The Lease ensures that ARSA has the ability to dispose of wastewater into Preston Reservoir consistent with the Use Agreement. As such, the Lease's termination date intentionally coincides with the Use Agreement.

Comments Regarding the Project's DEIR

1. WWTP Improvements

The DEIR for the Project notes that increased prisoner capacity will result in increased wastewater flows from MCSP, requiring improvements to MCSP's wastewater treatment plant (WWTP).¹

L13-2

¹ As noted by other commentators, it is unclear if these WWTP upgrades are part of the Project and DEIR. (Comments of the Central Valley Water Quality Control Board, August 7, 2013.) We have included comments regarding them assuming that they are.

18 Main Street ♦ Sutter Creek, CA 95685 ♦ TELEPHONE (209) 267-5647 ♦ FAX (209) 267-0639

ARSA comments on DEIR Mule Creek infill project

Implementation of the proposed project at MCSP would increase the generation of wastewater, increasing the demand for wastewater treatment at the existing WWTP. All flows would be accommodated by the existing WWTP, which is being upgraded with respect to treatment as part of a separate action in response to Regional Water Quality Control Board directives (refer to Section 3.7, "Hydrology and Water Quality" of this volume of the DEIR). The planned upgrades at the WWTP include additional clarifiers, upgrades to the belt filter press, the addition of diffused aeration capacity, and improved instrumentation and controls. As part of the contemplated development of the infill site, a separate connection from the single, level II infill correctional facility or the level II infill correctional facility complex would be extended westward from the infill site, past Mule Creek, and then placed along an internal access road to the WWTP. As noted above, CDCR is currently evaluating several options for disposal of the effluent from its WWTP, as development of the infill site would reduce the spray field acreage at MCSP. In the event that an agreement with the City of Ione is reached regarding disposal of effluent through the City's recently approved effluent disposal system, the City, with assistance from CDCR, would extend the existing City effluent irrigation infrastructure to additional acreage located west along Five Mile Drive. (DEIR, § 2.3.3.)

L13-2 cont'd

ARSA is concerned that the increased wastewater generated from the Project may affect ARSA's contractual rights under the Use Agreement and Lease. While these agreements are generally referred to in the DEIR, the scope of ARSA's and CDCR's discharge rights is not discussed. (See DEIR, p. 3.7-2; DEIR, p. 3.7-7 [noting CDCR's contractual requirement to provide an annual flow of between 80 af and 130 af to Preston Reservoir for ARSA]). While our understanding of the Project and the DEIR indicates that CDCR does not intend to increase flows into Preston Reservoir to discharge increased wastewater from the Project (except as discussed below), this should be clarified in the DEIR. Similarly, the DEIR should include a discussion of the contractual limitation on any increased Preston Reservoir discharges by CDCR.

2. *Spray Field Reductions*

In addition to increasing the amount of wastewater generated by MCSP, the Project will decrease the amount of currently available spray fields for MCSP. Before the WWTP upgrades discussed above are completed, MCSP will have reduced wastewater disposal capacity. While CDCR currently anticipates sending "MCSP-treated secondary effluent to the City of Ione via the existing 10-inch line that extends from MCSP to the City of Ione WWTP" to compensate for these reductions, CDCR recognizes that the Project may require increased Preston Reservoir discharges. "In the event that flows through the 10-inch line would approach capacity, CDCR would utilize existing storage capacity at the MCSP and Preston Reservoirs until such time as additional capacity within the 10-inch line is available." (DEIR, p. 3.7-16, 3.7-17.) Accordingly, in addition to increased total wastewater discharges due to the increased prisoner capacity from the Project, the Project will at least temporarily reduce CDCR's ability to treat and discharge existing wastewater. This may result in CDCR increasing discharges into Preston Reservoir.

L13-3

As discussed above, while the DEIR recognizes that Preston Reservoir and related improvements are operated under an agreement between ARSA, CDCR and Ione, it does not explain ARSA's contractual rights to utilize the Preston/Henderson System or the contractual limitations on CDCR's use of the same.

Page 2 of 3

ARSA comments on DEIR Mule Creek infill project

The DEIR should be revised to explain the scope of the parties' various rights. It should also be revised to clarify whether increased into Preston Reservoir and the other alternative disposal options are consistent with these rights. If they will not be, they should be eliminated as potential options.

L13-3 cont'd

3. Regional Efforts

Lastly, ARSA wished to note the importance of regional cooperation and the general inter-connectedness of ARSA's, Ione's and CDCR's wastewater disposal systems. For example, Mr. Fred Cordano, CDCR's Associate Director of Facility Operations, in a September 11, 2012 letter to the City of Ione in support of regional wastewater planning efforts, stated that CDCR, ARSA, and the City are "dependent upon each other to fulfill our individual obligations to assure that the regional system stays within compliance standards" and that CDCR has enjoyed a good neighbor and partner relationship with both the City and ARSA.

L13-4

These cooperative regional efforts are expected to become increasingly important in the future. Specifically, Section 12 of the Use Agreement contemplates that the parties will work towards forming a joint powers agency to develop a regional wastewater master plan for the Ione Valley. In addition, the parties are currently studying potential regional recycled water options. These regional efforts are vitally important to ARSA's, Ione's and CDCR's continued ability to comply with wastewater requirements.

In conclusion, ARSA has important contractual rights that are affected by the Project. Moreover, ARSA's use of the Preston/Henderson System, including its ability to discharge wastewater into Preston Reservoir, is a vital part of ARSA's wastewater disposal system. The DEIR should be amended to recognize and clarify that the Project is consistent with ARSA's rights under the Use Agreement and Lease. Please contact the undersigned with any questions.

L13-5

Sincerely,



Sean Rabé
General Manager

| Letter L13 Response | Sean Rabè, Amador Regional Sanitation Authority August 19, 2013 |
|------------------------------------|--|
| L13-1 | ARSA's interests affected by the project and historical agreements with CDCR are noted. No specific comments addressing the environmental analysis were raised; therefore, no further response can be provided. |
| L13-2 | <p>The comment incorrectly states that the project's anticipated increase in wastewater flows would necessitate improvements to MCSP's wastewater treatment plant (WWTP). As noted in Table 3.12-7 on page 3.12-13 of Volume 3 of the DEIR, adequate capacity is available at the existing MCSP WWTP to accommodate the proposed project. However, improvements are currently planned, as part of a separate project, to the MCSP WWTP that would improve the level of treatment provided by the existing plant.</p> <p>Regarding the existing Use Agreement and Lease between CDCR and ARSA, CDCR does not intend to modify the existing agreement as part of the proposed project. CDCR would continue to send flows to Preston Reservoir in accordance with its existing contractual limitations and would not impinge on ARSA's existing discharge rights.</p> |
| L13-3 | CDCR's evaluation of storage and disposal capacity included an evaluation of capacity in light of existing agreements, such as the existing Use Agreement and Lease with ARSA. While flows to Preston Reservoir may increase above historic/existing conditions, CDCR would not operate outside of its existing contractual limitations with respect to flows to Preston Reservoir and would not impinge upon ARSA's contractual rights at Preston Reservoir as established under the existing agreement. |
| L13-4 | The importance of regional cooperation and the general inter-connectedness of ARSA's, Lone's, and CDCR's wastewater disposal systems are noted. No specific comments addressing the environmental analysis were raised; however, please refer to Response to Comment L9-1. |
| L13-5 | Please refer to Responses to Comments L13-2 and L13-3. |



**AMADOR COUNTY
BOARD OF SUPERVISORS**

County Administration Center
810 Court Street • Jackson, CA 95642-9530
Telephone: (209) 223-6471
Facsimile: (209) 257-0671
Website: www.co.amador.ca.us

L14

August 19, 2013

Mr. Robert Sleppy
CDCR
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

Subject: Comments Regarding the Draft EIR for the Mule Creek Prison Expansion

Dear Mr. Sleppy:

Thank you for this opportunity to comment on the Draft EIR.

The Amador County Board of Supervisors discussed this item in open session at their Board meeting on August 13, 2013. The Board's concerns focused on the issues surrounding necessary improvements to the wastewater system at Mule Creek Prison.

The system currently employs extensive use of spray fields to dispose of primarily treated wastewater. The project as identified in the Draft EIR proposes to make improvements to the system, remove part of the spray field, and send treated wastewater to the City of Ione, which must then deal with the additional flow. The DEIR does contemplate cost sharing for some costs that Ione would bear to accommodate these increased flows. The Amador County of Supervisors believes that the State and CDCR have an implied responsibility to assist in improving existing systems that aid in the operation of their facilities.

L14-1

The Board of Supervisors is asking that CDCR consider and ultimately participate in the creation of a regional wastewater system along with the City of Ione and the Amador Regional Sanitation Authority (ARSA) that would be able to accept all of the wastewater from MCSP. A regional facility such as this could incorporate existing flows from the City of Ione and ARSA, both of which have aging systems that are in need of drastic improvements. The Board believes that funds spent in the creation of a regional system such as this will yield much better returns than simply improving the existing system at MCSP and expecting Ione to improve their system.

L14-2

The Board of Supervisors is also still concerned that the temporary construction road is opposite the entrance to the Castle Oaks subdivision. The Board wants to ensure that CDCR is still committed to keeping this road as a temporary entrance during construction only, and will challenge any attempt to make this a permanent entrance.

L14-3

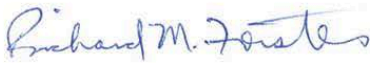
Finally, the Board of Supervisors would like a commitment from CDCR that will ensure that local contractors are utilized in the construction of this new facility. We consider "local" to mean businesses that currently exist within Amador County. Outreach to local entities at the earliest possible times, coupled with a local bidder preference would allow local businesses to participate in this project. Amador County has been assured by representatives from CDCR that local businesses will receive preference during the hiring process for construction of the infill facility.

L14-4

Again, thank you for the opportunity to comment on the Draft EIR. If you should have any questions, please feel free to contact me.

L14-5

Sincerely,



Supervisor Richard M. Forster
Chairman, Amador County Board of Supervisors

Amador County Board of Supervisors ▢ County Administration Center ▢ 810 Court Street ▢ Jackson, California ▢ 95642
Telephone (209) 223-6470 ▢ FAX (209) 257-0619

**Letter
L14
Response****Richard Forster, Amador County Board of Supervisors**
August 19, 2013

- L14-1 The comment incorrectly states that the MCSP WWTP treats wastewater to primary standards. It treats wastewater to disinfected secondary standards before discharging to spray fields.
- To clarify the project description at MCSP, the wastewater effluent that would be dispersed at the proposed additional offsite fields would be wastewater effluent from the MCSP WWTP. If the current effluent export pipeline between Preston Reservoir and the lone WWTP is used to transfer treated effluent to the new offsite spray fields west of lone, it can be assumed that some intermingling of effluent from all three entities may occur. However, the objective of the proposed new offsite spray field is to accommodate only the volume of effluent that can no longer be disposed of on MCSP spray fields due to construction of the proposed Level II Infill Correctional Facilities Project. However, to assure hydraulic efficiency, CDCR may construct a new effluent transfer pipeline between its main effluent storage reservoir and the new spray field. This will limit the need for pumps to operate the irrigation equipment. At the proposed offsite spray fields, above-grade, fixed-set irrigation systems, wheel-line systems or flood-irrigation systems would be used for distribution of the reclaimed water. Improvements to the MCSP WWTP (e.g., additional clarifiers, upgrades to the belt filter press, the addition of diffused aeration capacity, and improved instrumentation and controls) are authorized under a separate legislative capital improvement plan; this funding is not from the SB 1022 infill budgetary authority. Further, as noted on page 3.12-14 of Volume 3 of the DEIR, CDCR would provide funding for the cost of operating the proposed new offsite spray fields.
- L14-2 The desire for a regional wastewater system is noted. Please refer to Response to Comment L9-1. As discussed, CDCR's WWTP at MCSP is fully functional; it only requires minor modifications (connection) to accept flows from the new infill facility and to increase mechanical reliability. CDCR believes it would not be cost effective for CDCR to abandon its existing WWTP to instead participate in a regional plant.
- L14-3 As stated in the DEIR, placement of a temporary construction entrance centered on the prison's existing maintenance gate opening would be limited to the construction period. CDCR does not intend to have a second permanent entrance to MCSP. Temporary restriping of the intersection of SR 104 and Castle Oaks Drive would occur (Exhibit 2-6 in Volume 3 of the DEIR) pursuant to Caltrans encroachment permit requirements. In response to community concerns associated with a traffic signal, the infill construction contractor will provide manual traffic control (e.g., flaggers, portable electronic signage, temporary directional barriers, etc.) for the duration of construction. Operation of this temporary construction entrance will be coordinated with the City of Lone's police services, CalTrans, the California Highway Patrol, and Amador County Sheriff.
- L14-4 The commenter's desire that CDCR use local contractors for the construction of this facility is noted. No specific comments addressing the environmental analysis were raised. CDCR's process for retaining contractors, including outreach, would be addressed outside the CEQA process.
- L14-5 The commenter's gratitude and offer of a contact are noted.



ESTABLISHED 1850

CITY OF VACAVILLE

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VACAVILLE, CALIFORNIA 95688-6908
www.cityofvacaville.com

STEVE HARDY
Mayor

DILENNA HARRIS
Vice Mayor

CURTIS HUNT
Councilmember

MITCH MASHBURN
Councilmember

RON ROWLETT
Councilmember

L15

August 19, 2013

Community Development Department

Robert Sleppy
California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827

Email: CDCR_infill@ascentenvironmental.com

**SUBJECT: COMMENTS REGARDING THE NOTICE OF AVAILABILITY OF A DRAFT
ENVIRONMENTAL REPORT FOR THE PROPOSED LEVEL II INFILL
CORRECTIONAL FACILITIES PROJECT, SCH #2012122038**

Dear Mr. Sleppy:

Thank you for providing the staff of the City of Vacaville (City) the opportunity to review and comment on the Draft Environmental Impact Report (DEIR) prepared for the proposed Level II Infill Correctional Facilities Project on the grounds of California State Prison Solano (CSPS) and California Medical Facility (CMF). It is our understanding that the CSPS/CMF site (*identified as the CMF/SOL site in the DEIR*) will be considered for a single infill housing facility that would cover approximately 35 acres, and would include three separate dormitory structures with approximately 264 beds per structure, for a total of 792 beds, and approximately 105,000 square feet of accessory and support structures.

L15-1

General Comments

1. On February 4, 2013, the City provided comments on the NOP for the aforementioned EIR. Unfortunately, we feel that some of our comments were not addressed. As such, some of the City's NOP comments are repeated herein.
2. The proposed project will require an amendment to the existing Joint Powers Agreement (JPA) between the City and the California Department of Corrections and Rehabilitation (CDCR). The DEIR does not acknowledge this factor. This action should be identified in project actions.
3. The Project Description provides minimal information regarding the specifics of the project. For example, it does not include an adequate site plan, building elevations, floor plans, summary of building square footage and parking needs.

L15-2

L15-3

L15-4

- Development Engineering Division

- ## Utilities

- August 19, 2013
Page 2 of 5

- | | | |
|--|---|--------|
| 12. Pages 2-4, 2-5 Correction: Currently, approximately 6,650-5,000 acre-feet per year (AFY) is withdrawn. The estimated <u>safe sustainable</u> yield is 8,000 AFY, which can be increased to 40,000 <u>9,000</u> short term AFY in dry years (SCWA and Solano Agencies 2004). (Source: 2010 Urban Water Management Plan) | I | L15-13 |
| 13. Page 3.12-3: Currently <u>As of 2010</u> , approximately 5,000 acre-feet per year of groundwater is withdrawn. Vacaville is continuing to explore well field expansion as a means of maintaining adequate water supply. | I | L15-14 |
| 14. Page 3.12-6: This section lacks a discussion on SBx7-7 Potable Water Demand Reductions contained in the Urban Water Master Plan. Please include. | I | L15-15 |
| 15. Page 3.12-7: Under "Settlement Water (DWR Agreement) please include: However, there are hydrological factors that may limit the availability of the full allocation. | I | L15-16 |
| 16. Table 3.12-6 Footnotes: What year does the footnote apply? What is the source of note b.? It should be City of Vacaville or Solano County Water Agency. | I | L15-17 |
| 17. Page 3.12-11: Should this Vacaville project move forward, the EIR should include a mitigation measure requiring an amendment of the current Joint Powers Agreement. | I | L15-18 |
| 18. Page 3.12-13: Any future prison expansions will require master plan sewer modeling by the City's wastewater consultant and comply with City of Vacaville General Plan Update (scheduled for adoption 2014). | I | L15-19 |
| 19. Page 3.12.-13: Add SBx7-7 Potable Water Demand Reduction to the Water Supply list. | I | L15-20 |
| 20. Page 4-14: See previous water supply comments to demand estimates in Volume 5. | I | L15-21 |
| 21. Page 4-14 Correction: The wastewater flows of the existing CMF and SOL, the newly-established 64-Bed ICF, and the proposed level II infill correctional facility is estimated at <u>1,367,480 gpd</u> . – Volume should match Table 3.12-10 (Page 3.12-18 total of 1,335,222 gpd. | I | L15-22 |
| 22. Please correct the totals in Table 3.12-9 (see below) | I | L15-23 |

| Table 3.12-9 Summary of Total Normal Year Water Supply and Demand (afy) in Five Year Increments | | | | |
|--|---------------|---------------|---------------|---------------|
| Demand | 2015 | 2020 | 2025 | 2030 |
| Projected City of Vacaville Demand | 17,887 | 18,748 | 19,609 | 20,344 |
| Projected CDCR Demand <small>Bulldout?</small> | 945 | 945 | 945 | 945 |
| Total Demand | 18,832 | 19,693 | 20,554 | 21,289 |
| Supply-Normal Year | 30,853 | 32,723 | 34,508 | 36,393 |
| Total City of Vacaville Supply | 34,473 | 36,953 | 37,953 | 39,753 |
| Total Solano Project Supply (CDCR) | 1,200 | 1,200 | 1,200 | 1,200 |
| Total Supply-Norm Years | 35,373 | 37,253 | 39,053 | 40,953 |
| Surplus (Supply minus Demand, Normal Years) | 16,541 | 17,560 | 18,499 | 19,664 |
| Supply-Multi Dry Years | 28,424 | 30,194 | 31,929 | 33,692 |
| Total City of Vacaville Supply | 30,245 | 35,745 | 38,585 | 39,234 |
| Total Solano Project Supply (CDCR) | 1,200 | 1,200 | 1,200 | 1,200 |
| Total Supply-Norm Years | 31,445 | 36,945 | 39,785 | 40,434 |
| Surplus (Supply minus Demand Multi-Dry Years) | 12,613 | 17,252 | 19,231 | 19,145 |
| <small>Source: Solano County Water Agency 2010; Compiled by Ascent Environmental 2013.</small> Use supply per UWMP, NOT entitlements. See UWMP Table 26 & 28 | | | | |

L15-23 cont'd

Employment, Population and Housing

23. This comment was included in the City's NOP comments, but was not addressed in the DEIR: The City's Housing Department administers the City's Section 8 housing assistance program, also known as the "Housing Choice Voucher" program. The federally-funded program subsidizes the payment of rent by families with incomes below 50% of the local area median income. The existing prisons are straining the City's housing programs due to presence of relatives and friends of inmates who move to Vacaville in order to be closer to the inmates. This creates a demand for housing, which, in turn, places demands on the City's housing assistance programs. That is because many of these persons move to Vacaville with Section 8 assistance from other communities or, once here, they apply for assistance from the City. They then are placed on a waiting list along with other long-term Vacaville residents to receive assistance. Adding more beds and employees along with additional visitors to the prisons will further increase this demand for City housing assistance. In addition, visitors to the prison put a strain on other local social service providers who provide food, shelter, and transportation.

L15-24

Note: The City is not allowed to ask the reason someone has moved to Vacaville, or whether or not they have a relative or friend in prison. However, sometimes this information is voluntarily offered to City staff during the intake process, income recertification meetings, or during home inspections.

Please include an analysis of how the project would impact the need for additional housing services in the DEIR.

Contact Information

Please send all comments and correspondence to the City regarding the proposed project and its environmental review to:

Fred Buder, City Planner
City of Vacaville Community Development Department
Advanced Planning Division
650 Merchant Street
Vacaville, CA 95688

L15-25

I can also be reached at (707) 449-5307 or Fbuder@cityofvacaville.com.

Sincerely,



FRED BUDER
City Planner

cc: Laura Kuhn, City Manager
Mark Mazzaferro, Public Information Officer
Royce Cunningham, Interim Director of Utilities
Shawn Cunningham, Interim Director of Public Works
Frank Drayton, Fire Chief
Rich Word, Police Chief
Kerry Walker, Community Services Director
Emily Cantu, Housing Services
Tyra Hays, Senior Planner

| Letter L15 Response | Fred Buder, City of Vacaville August 19, 2013 |
|------------------------------------|--|
| L15-1 | The commenter provides introductory information. The commenter's description of proposed facilities is accurate. |
| L15-2 | Submission of NOP comments is noted. Please refer to Responses to Comments L15-3 through L15-25. |
| L15-3 | Wastewater flows associated with the project are anticipated to be within the existing agreement, as discussed in Impact 3.12-2 in Volume 5 of the DEIR. If the CMF/SOL Infill Site alternative is adopted, CDCR would seek to amend the JPA to reflect the proposed project. However, it is important to note that the proposed flows at CMF/SOL, inclusive of a level II infill correctional facility, would be less than historic flows at CMF/SOL. |
| L15-4 | The site plan for the CMF/SOL Infill Site is provided in Exhibit 2-3 of Volume 5 of the DEIR. As described on page 2-4 of Volume 5 of the DEIR, Section 3.3, "Description of Proposed Project," of Chapter 3 in Volume 1, provides a detailed description of the single, level II infill correctional facilities, including the housing units, support facilities, staffing, parking, operations, lighting, security, and construction schedule. Please refer to Section 3.3 of Volume 1 for a full description of these project elements, which are common to all of the potential infill sites. Within Volume 1, square footage, information regarding building elevations, and parking availability are provided. This information was presented in Volume 1 because it is consistent throughout all of the potential infill sites and in the interest of not repeating information. This information is adequate for evaluation of the proposed project. |
| L15-5 | CDCR acknowledges the City's development impact fees. Please refer to Response to Comment L11-3 for an explanation of CDCR's obligations to pay fees to local agencies through a locally-established fee program. |
| L15-6 | Please refer to Response to Comment L14-4. Potential impacts related to land use conflicts and recreational uses were evaluated in the DEIR. Please refer to Sections 3.8, "Land Use, Agriculture, and Forestry Resources," and Section 3.10, "Public Services," of Volume 5 of the DEIR. Additionally, the DEIR included visual simulations to determine if conflicts with the views from the surrounding neighborhood could occur and concluded that impacts would be significant and unavoidable. It is important to note that because the proposed project would be located on a site dedicated to correctional facilities, the proposed project would not result in a change of use; there is little potential to create any new land use conflicts. However, the DEIR evaluated in detail potential conflicts associated with correctional facilities being located more proximate than existing facilities to the surrounding neighborhood. As described therein, impacts were determined to be less than significant with the exception of visual impacts, which were found to be significant and unavoidable. |
| L15-7 | Please refer to Master Response 1, Public Outreach and Public Review Period. CDCR exceeded CEQA noticing requirements for public review of both the NOP and the DEIR. No additional notification for the CEQA process is considered necessary. |
| L15-8 | The Level II Infill site will not include a vehicular or pedestrian connection between the prison and Keating Park. As shown on Exhibits 3.11-3 and 3.11-4, the infill site is not expected to add traffic to the California Drive/Alamo Lane intersection at the entrance to Keating Park (project traffic is expected to use Alamo Drive rather than California Drive). |

Visitor traffic on weekends is also expected to use Alamo Drive and Peabody Road, because they provide more direct connections from I-80 to the proposed access locations to the infill site (on Peabody Road). It is unlikely that visitors would park their cars at Keating Park and walk to the infill site because the park is more than 1.5 miles from the proposed entrance locations to the infill site, and there is no sidewalk on the prison side of California Drive and Peabody Road. Therefore, no significant transportation effects to Keating Park are expected to occur as a result of implementing the CMF/SOL Infill Site alternative.

- L15-9 CEQA does not provide for a response to comments received on the NOP. Rather, CEQA requires the lead agency to consider the comments during preparation of the DEIR. CDCR did consider the request made by the City of Vacaville Fire Department (VFD), however due to security concerns and CDCR's need to ensure the safety of any pick-ups by VFD but also VFD personnel as well, establishment of a single point of pick-up was not considered feasible. As noted in the DEIR, the existing level of response provided by VFD to CMF and SOL is considered adequate and would be expected to continue with the operation of a single, level II infill correctional facility at the infill site.
- L15-10 Effects associated with increased impervious surfaces at the CMF/SOL Infill Site are addressed in Impact 3.7-2, Stormwater System Impacts, of Volume 5 of the DEIR. As described, this impact would be reduced to a less-than-significant level after implementation of Mitigation Measure 3.7-2. As noted in Impact 3.7-2 and as required by Mitigation Measure 3.7-2, CDCR would design and construct onsite detention facilities to accommodate existing flows already handled at the infill site, as well as additional flows resulting from the proposed project. All flows from CDCR property would be at or below pre-project flows; therefore, modifications to the City's existing detention basin and the rest of the City storm drain system would not be required.
- L15-11 As described in the first paragraph of Impact 3.12-1, Impacts on Water Supply, of Volume 5 of the DEIR, the "average daily water demand factor of 150 gpd per inmate ... encompasses potable water demands for the entire facility, including landscaping and staff demands." CDCR has always developed its water use estimates factoring all institutional uses (inmates, staff, landscaping, etc.) and incorporating this data into a per-inmate number.
- L15-12 In response to this comment, the text on page 3.7-5 of Volume 5 of the DEIR has been modified as follows. This change does not alter the conclusions of the DEIR and recirculation would not be required.
- Groundwater used domestically by the City of Vacaville comes from ~~43~~ 12 wells, ~~42~~ 10 of which withdraw water from the deep aquifer in the basal zone of the Tehama Formation.
- L15-13 In response to this comment, the text on page 3.7-6 of Volume 5 of the DEIR has been modified as follows. This change does not alter the conclusions of the DEIR regarding the significance of environmental impacts.
- Currently, approximately ~~6,650~~ 5,000 acre-feet per year (AFY) is withdrawn. The estimated ~~safe~~ sustainable yield is 8,000 AFY, which can be increased to ~~40,000~~ 9,000 short term AFY in dry years (SCWA and Solano Agencies 2004). (Source: 2010 Urban Water Management Plan).
- L15-14 In response to this comment, the text on page 3.12-3 of Volume 5 of the DEIR has been modified as follows. This change does not alter the conclusions of the DEIR regarding the significance of environmental impacts.

~~Currently~~ As of 2010, approximately 5,000 acre-feet per year of groundwater is withdrawn. Vacaville is continuing to explore well field expansion as a means of maintaining adequate water supply.

- L15-15 The following text is added to page 3.12-7 of Volume 5 of the DEIR, below the discussion of Recycle Water. This change does not alter the conclusions of the DEIR regarding the significance of environmental impacts.

SBx7-7 Water Use Targets

In February 2008, Governor Arnold Schwarzenegger introduced a plan for improving the Sacramento-San Joaquin Delta, a component of which is to achieve a 20 percent reduction in per capita water use statewide by the year 2020. In November 2009, Senate Bill 7-7 (SBx7-7) was signed into law, addressing urban and agricultural water conservation. SBx7-7 requires water suppliers to calculate baseline per capita water use and per capita water use targets for 2015 and 2020 in the 2010 UWMP. The City determined that the 2020 per capita water use target is 166 gallons per capita per day (City of Vacaville 2011).

- L15-16 The text on page 3.12-7 of Volume 5 of the DEIR is modified as follows. This change does not alter the conclusions of the DEIR regarding the significance of environmental impacts.

Recycled Water

Preliminary planning estimates indicate that recycled water will be available for delivery in 2020. Recycled water is a 100 percent reliable source of non-potable water and is completely independent of hydrologic conditions. Therefore, the City anticipates that this source will be 100 percent available during normal, single-dry, and multiple-dry years. However, there are hydrological factors that may limit the availability of the full allocation.

- L15-17 The footnotes in Table 3.12-6 of Volume 5 of the DEIR applies to both years 2005 and 2006, which exceeded the 560 afy City water allocation to CMP/SOL. The source of footnote b is derived from California Prison Health Care Receivership Corporation's 2009 California Health Care Facility Vacaville Draft Water Distribution System Master Plan, as prepared by Nolte Associates.
- L15-18 Please refer to Response to Comment L15-3.
- L15-19 CDCR would comply with the City's request for sewer modeling, if it approves the project at CMF/SOL.
- L15-20 SBx7-7 does not apply to the Level II Infill Correctional Facilities Project EIR as CDCR does not qualify as a water supplier under the bill. That said, CDCR is committed to reducing water consumption and, as noted on page 3-13 of Volume 1 of the DEIR, any facilities constructed as part of the proposed project would achieve LEED Silver standards or greater. These standards require extensive use of water conservation measures.
- L15-21 Please refer to Response to Comment L15-11. No modification of the analysis of the DEIR is necessary as a result of this comment.
- L15-22 The text on page 4-14 of Volume 5 of the DEIR has been modified as follows. This change does not alter the conclusions of the DEIR regarding the significance of environmental impacts.

The wastewater flows of the existing CMF and SOL, the newly established 64-Bed ICF, and the proposed level II Infill correctional facility is estimated to ~~1,367,480~~ 1,335,222 gpd.

- L15-23 Corrections to Table 3.12-9 of Volume 5 of the DEIR have been made as follows. This change does not alter the conclusions of the DEIR regarding the significance of environmental impacts.

| Table 3.12-9 Summary of Total Normal Year Water Supply and Demand (afy) in Five Year Increments | | | | |
|--|---|---|---|---|
| Demand | 2015 | 2020 | 2025 | 2030 |
| Projected City of Vacaville Demand | 17,887 | 18,748 | 19,609 | 20,344 |
| Projected CDCR Demand | 945 | 945 | 945 | 945 |
| Total Demand | 18,832 | 19,693 | 20,554 | 21,289 |
| Supply-Normal Year | | | | |
| Total City of Vacaville Supply | 34,173 <u>30,853</u> | 36,053 <u>32,723</u> | 37,853 <u>34,508</u> | 39,753 <u>36,393</u> |
| Total Solano Project Supply (CDCR) | 1,200 | 1,200 | 1,200 | 1,200 |
| Total Supply-Norm Years | 35,373 <u>32,053</u> | 37,253 <u>33,923</u> | 39,053 <u>35,708</u> | 40,953 <u>37,593</u> |
| Surplus (Supply minus Demand, Normal Years) | 16,541 <u>13,221</u> | 17,560 <u>14,230</u> | 18,499 <u>15,154</u> | 19,664 <u>17,696</u> |
| Supply-Multi Dry Years | | | | |
| Total City of Vacaville Supply | 30,245 <u>28,424</u> | 35,745 <u>30,194</u> | 38,585 <u>31,929</u> | 39,234 <u>33,692</u> |
| Total Solano Project Supply (CDCR) | 1,200 | 1,200 | 1,200 | 1,200 |
| Total Supply-Norm Years | 31,445 <u>29,624</u> | 36,945 <u>31,394</u> | 39,785 <u>33,129</u> | 40,434 <u>34,892</u> |
| Surplus (Supply minus Demand Multi-Dry Years) | 12,613 <u>10,792</u> | 17,252 <u>11,701</u> | 19,231 <u>12,575</u> | 19,145 <u>13,603</u> |
| Source: Solano County Water Agency 2010; Compiled by Ascent Environmental 2013. | | | | |

- L15-24 Because the City is not allowed to ask the reason someone has moved to Vacaville, as stated by the commenter, it is impossible to determine an increase in population resulting from new residents that are the family of new inmates. Impact 3.4-1, Substantial Population Growth and Impact 3.4-2, Increased Demand for Housing in Volume 5 of the DEIR, provide a good-faith effort at analyzing and projecting an increase in employment, population, and housing that would occur as a result of implementation of the Level II Infill Correctional Facilities Project at the CMF/SOL infill site. Without evidence to support a substantial increase in population resulting from implementation of the Level II Infill Correctional Facilities Project, re-calculation of population projections within the City of Vacaville cannot be considered and is not required. The analysis was prepared on the best information available.

In addition, as discussed in the last paragraph on page 3.4-4 of Volume 5 of the DEIR, “[p]opulation and employment growth associated with implementation of the proposed Level II Infill Correctional Facilities Project would not, in and of itself, result in significant environmental impacts.” Section 8 housing availability is a socioeconomic effect, which is not subject to CEQA analysis (CEQA Guidelines Section 15131[a]).

- L15-25 Contact information for the City of Vacaville is noted.

L16**Development Services Department***Advance Planning Division*

August 19, 2013

California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827
Attn: Robert Sleppy

Email: CDCR_infill@ascentenvironmental.com

Subject: Potential Level II Infill Sites -- R. J. Donovan (RJD) Infill Site-South San Diego County, 480
Alta Road, San Diego, CA 92179.

Dear Mr. Sleppy:

Thank you for the opportunity to comment on the DEIR for the potential expansion of the R.J. Donovan facility. The Donovan facility is located within O'Neal Canyon immediately south of the City of Chula Vista. It is surrounded by the Otay Ranch Preserve (Preserve) and is adjacent to the Otay Valley Regional Park (OVRP). The OVRP extends about 11 miles inland from the southeastern edge of the Salt Ponds at the mouth of the river, through the Otay River Valley, to the land surrounding both Lower and Upper Otay Lakes.

As part of our comments on the NOP, dated February 4, 2013 (attached) we requested that the subject EIR address the visual impact of the expansion of the Donovan Facility on the OVRP and Eastern Chula Vista viewsheds. In review of the DEIR (i.e. Vol.2 Section 4.4.14, Visual Resources) it appears that the potential visual impact(s) on these adjacent view sheds were not analyzed.

L16-1

Due to the sensitive location of the Donovan Facility we respectfully request that the subject EIR address the potential aesthetic impacts of the proposed expansion on the views from the OVRP and Eastern Chula Vista as discussed below.

Otay Valley Regional Park

The OVRP consists primarily of areas of sensitive biological resources traversed by trails. The Donovan Facility is adjacent to the OVRP Concept Plan boundaries and is within the view shed of the trails within the OVRP. The Concept Plan includes the following policy regarding the Donovan facility:

"Trail Corridors extend along both sides of the river, follow Johnson, and O'Neal Canyons and continue offsite to regional trails proposed in Salt Creek Canyon and further to the east/southeast. A Trail Corridor is shown between the planned private development on Otay Mesa to the south of the Park and the RJ Donovan Correctional Facility. This Trail Corridor is an important link to BLM lands to the east."

L16-2

Page 2
August 19, 2013
City of Chula Vista
Donovan Facility Expansion DEIR Comment Letter

In accordance with the OVRP design guidelines, "it is important for governing agencies to encourage and influence design practices that blend new development with the natural and cultural setting of the OVRP". To enhance the visual experience for park users and for the protection of native resources within the park, please ensure that the project addresses compatible edge treatments and appropriate buffers adjacent to the OVRP. The EIR should provide an analysis of the project's consistency with the OVRP Design Standards and Guidelines particularly section 5.3.3 of the Design Standards and Guidelines that includes a list of appropriate treatments that will help acknowledge and complement OVRP amenities and resources. The EIR should provide an analysis of the project's consistency with the following:

- Minimization of alteration of natural landforms
- Improved appearance of the development by under-grounding utilities
- Use of three dimensional relief for building elevations that face the OVRP in order to provide visual architectural interest and articulation for those building frontages that can be viewed from the OVRP.
- Minimization of large building signs, reflective glass surfaces and materials that cause glare.
- Minimization of lights that cause high levels of illumination adjacent to the OVRP.
- Avoidance of roof mounted equipment.
- Outdoor storage areas, refuse collection areas and loading areas located in interior side yards or properly screened to reduce visual impacts to the OVRP

L16-2 cont'd

Eastern Chula Vista View Shed

The Donovan Facility is visible from areas located within the eastern portion of the City of Chula Vista, including the communities of Eastlake, Otay Ranch, Rolling Hills Ranch, etc. Some of these areas are currently developed and others are planned to develop in the future. Please include information in the EIR regarding potential impacts of the project on the eastern portion of Chula Vista. The impact analysis should take into account visual impacts to the communities in Eastern Chula Vista including light and glare impacts.

L16-3

We appreciate the opportunity to comment on the DEIR. Please send all future project correspondence on this project to my attention. If you have any questions regarding the above comments, please contact me at (619) 585-5707.

L16-4

Sincerely,



Marilyn R.F. Ponseggi
Principal Planner

Cc: Scott Donaghe, Principal Planner
Glen Laube, Associate Planner
Lynnette Tessitore-Lopez, Associate Planner

**Development Services Department***Advance Planning Division*

February 4, 2013

California Department of Corrections and Rehabilitation
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827
Attn: Robert Sleppy

Email: CDCR_infill@ascentenvironmental.com

Subject: Potential Level II Infill Sites -- R. J. Donovan (RJD) Infill Site-South San Diego County, 480
Alta Road, San Diego, CA 92179.

Dear Mr. Sleppy:

Thank you for the opportunity to comment on the Notice of Preparation (NOP) for the potential expansion of the R.J. Donovan facility. The Donovan facility is located within O'Neal Canyon immediately south of the City of Chula Vista. It is surrounded by the Otay Ranch Preserve (Preserve) and is adjacent to the Otay Valley Regional Park (OVRP). The OVRP extends about 11 miles inland from the southeastern edge of the Salt Ponds at the mouth of the river, through the Otay River Valley, to the land surrounding both Lower and Upper Otay Lakes.

Due to the sensitive location of the Donovan Facility we request that the following issues be addressed in the subject EIR:

Otay Valley Regional Park

The OVRP consists primarily of areas of sensitive biological resources traversed by trails. The Donovan Facility is adjacent to the OVRP Concept Plan boundaries and is within the view shed of the trails within the OVRP. The Concept Plan includes the following policy regarding the Donovan facility:

"Trail Corridors extend along both sides of the river, follow Johnson, and O'Neal Canyons and continue offsite to regional trails proposed in Salt Creek Canyon and further to the east/southeast. A Trail Corridor is shown between the planned private development on Otay Mesa to the south of the Park and the RJ Donovan Correctional Facility. This Trail Corridor is an important link to BLM lands to the east."

Page 2
February 4, 2013
City of Chula Vista
Response to Donovan Facility Expansion NOP

Please address the impact of the expansion of the Donovan Facility on the OVRP. This analysis should address the policy above as well as potential aesthetic impacts of the proposed expansion on the views from the OVRP.

In accordance with the OVRP design guidelines, "it is important for governing agencies to encourage and influence design practices that blend new development with the natural and cultural setting of the OVRP". To enhance the visual experience for park users and for the protection of native resources within the park, please ensure that the project addresses compatible edge treatments and appropriate buffers adjacent to the OVRP. The EIR should provide an analysis of the project's consistency with the OVRP Design Standards and Guidelines particularly section 5.3.3 of the Design Standards and Guidelines that includes a list of appropriate treatments that will help acknowledge and complement OVRP amenities and resources. The EIR should provide an analysis of the project's consistency with the following:

- Minimization of alteration of natural landforms
- Improved appearance of the development by under-grounding utilities
- Use of three dimensional relief for building elevations that face the OVRP in order to provide visual architectural interest and articulation for those building frontages that can be viewed from the OVRP.
- Minimization of large building signs, reflective glass surfaces and materials that cause glare.
- Minimization of lights that cause high levels of illumination adjacent to the OVRP.
- Avoidance of roof mounted equipment.
- Outdoor storage areas, refuse collection areas and loading areas located in interior side yards or properly screened to reduce visual impacts to the OVRP

Biological Impacts

The Donovan Facility is surrounded by the Otay Ranch Preserve therefore the expansion of the facility may impact sensitive biological resources. The EIR should analyze the potential impacts to biological resources from the project including edge effects on the Preserve. These edge effects include the installation of additional lighting, noise (during construction and on-going), drainage, release of toxic substances, and invasive species. The analysis should include preparation of a Biological Technical Report that includes a thorough analysis of the project's consistency with the applicable policies, goals, and objectives of the Otay Ranch Resource Management Plan (Phases I and II).

Eastern Chula Vista View Shed

The Donovan Facility is visible from areas located within the eastern portion of the City of Chula Vista, including the communities of Eastlake, Otay Ranch, Rolling Hills Ranch, etc. Some of these areas are currently developed and others are planned to develop in the future. Please include information in the EIR regarding potential impacts of the project on the eastern portion of Chula Vista. The impact analysis should take into account visual impacts to the communities in Eastern Chula Vista including light and glare impacts.

Page 3
February 4, 2013
City of Chula Vista
Response to Donovan Facility Expansion NOP

We appreciate the opportunity to comment on this NOP and look forward to working with you during the preparation of the EIR and to reviewing the completed document. The City of Chula Vista requests notification prior to any and all scheduled public meetings, hearings, and workshops, and availability of draft documents related to the proposed project. Please send notices to my attention. If you have any questions regarding the above comments, please contact me at (619) 585-5707.

Sincerely,



Marilyn R.F. Pongeggi
Principal Planner

Cc: Scott Donaghe, Principal Planner
Glen Laube, Associate Planner
Lynnette Tessitore-Lopez, Associate Planner

**Letter
L16
Response****Marilyn Pongeggi, City of Chula Vista**
August 19, 2013

- L16-1 The DEIR did evaluate the potential aesthetic impacts of the proposed project, including an evaluation from representative viewpoints. Viewpoint 5, shown on Exhibits 3.13-1 (page 3.13-4) and 3.13-6 (page 3.13-9) of Volume 2 of the DEIR, are considered to represent and provide a basis for the evaluation of potential aesthetic impacts of the proposed project from both eastern Chula Vista and Otay Valley Regional Park. As described therein, because of undulating topography and vegetation, the existing RJD facilities, behind which the proposed project would be located, are barely discernible. Further, as noted on page 3.13-13, implementation of the proposed project, in light of existing correctional institutions and other development, would not result in a substantial adverse effect to long distance views, including those from eastern Chula Vista and Otay Valley Regional Park.
- L16-2 With regard to policies outlined in the Otay Valley Regional Park (OVRP) Concept Plan, page 13 states that, “[a]doption of this Concept Plan does not result in modification of existing jurisdictional boundaries, change existing zoning or land use plans or add new development regulations. However, it may be necessary for each jurisdiction to adopt amendments to General, Community and Specific Plan, as well as rezone land to be consistent with the Concept Plan Elements as they are acquired or developed by the public agencies.”
- Volume 2 of the DEIR provides an evaluation of potential conflicts with planning efforts associated with the RJD Infill Site. As stated on page 3.8-6, “[t]he RJD Infill Site is located entirely within CDCR property, and development of the infill site would be consistent with the existing land use designation and zoning for the greater RJD property, as outlined in the County of San Diego Otay Subregional Plan.” Because the OVRP Concept Plan, as stated above, does not change existing zoning or land use plan or add new development regulations, it is not applicable to considerations of conflicts with planning efforts. Furthermore, CDCR is not subject to the goals, policies, and ordinances of local agencies. With respect to visual compatibility, please refer to Response to Comment L16-1 above. Development at the infill site would be located behind RJD from the perspective of OVRP and would be visually similar to the existing RJD and County jail facilities. As such, it would be considered to be consistent with existing visual characteristics in the area within the same view and would not create issues of visual incompatibility.
- L16-3 Section 3.13, “Visual Resources,” in Volume 2 of the DEIR provides five viewpoints (described on page 3.13-3 in Volume 2 of the DEIR). Viewpoint 5 is located within the City of Chula Vista from the corner of Eastlake Parkway and Hunte Parkway, in the Otay Ranch planned community. With consideration of these viewpoints, the environmental analysis addresses the potential degradation of scenic vistas, visual character impacts, and light and glare impacts. These impacts were determined to be less than significant because the level II correctional facility would be of similar character as surrounding institutional uses, as viewed from the Otay Ranch planned community as well as other, much closer, viewpoints (i.e., Viewpoints 1 – 4). The effects on visual resources from views within Eastern Chula Vista (e.g., Eastlake, Otay Ranch, Rolling Hills Ranch, etc.) would be the same as discussed in the Visual Resources section of Volume 2 of the DEIR.
- L16-4 Comment noted.

L17

DEPARTMENT OF PUBLIC WORKSFLOOD CONTROL • LAND DEVELOPMENT & CONSTRUCTION • OPERATIONS
SOLID WASTE MANAGEMENT • SURVEYOR • TRANSPORTATION

COUNTY OF SAN BERNARDINO

825 East Third Street • San Bernardino, CA 92415-0835 • (909) 387-8104
Fax (909) 387-8130GERRY NEWCOMBE
Director of Public Works

August 19, 2013

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10(ENV)-4.01

Calif. Dept of Corrections and Rehabilitation (CDCR)
Office of Facility Planning, Construction and Management
9838 Old Placerville Road, Suite B
Sacramento, CA 95827**RE: NOTICE OF AVAILABILITY OF A DRAFT ENVIRONMENTAL IMPACT REPORT (DEIR)
FOR THE LEVEL II INFILL CORRECTIONAL FACILITIES PROJECT**

To Whom It May Concern:

Thank you for giving the San Bernardino County Department of Public Works (Department) the opportunity to comment on the above-referenced project. We received this request on June 24, 2013, and an extension notice on August 2, 2013. Pursuant to our review, the following comment is provided:

Environmental Management Division (Brandy Wood, Ecological Resource Specialist (909) 387-7971):

L17-1

1. We understand that the CIM Infill Site (Chino) has not been evaluated at an equal, project-level analysis in this DEIR and that an additional analysis will be required, if CDCR were to fully consider this site for development. Please provide us with a copy of this analysis when that time arises.

If you have any questions, please contact the individual who provided the specific comment, as listed above.

Sincerely,

ANNESLEY IGNATIUS, P.E.
Deputy Director – Environmental & Construction

ARI:EJH:nh/CEQA Comments_DEIR_CDCR_Level II Infill Correctional Facilities Project_081913

Cc: Erma Hurse, Senior Planner, EMD

GREGORY C. DEVEREAUX
Chief Executive Officer

| | | | |
|----------------------|-----------------|---------------|-----------------|
| Board of Supervisors | | | |
| ROBERT A. LOVINGOOD | First District | JAMES RAMOS | Third District |
| JANICE RUTHERFORD | Second District | GARY C. OVITT | Fourth District |
| JOSIE GONZALES | Fifth District | | |

**Letter
L17
Response****Annesley Ignatius, San Bernardino County Department of Public Works**
August 19, 2013

- L17-1 The commenter is correct that CIM was not evaluated at a level equal to the other four sites due to issues related to the need for additional study of infrastructure capacity. Should CIM be selected for development and further evaluation, CDCR will provide a copy of the subsequent analysis to San Bernardino County.